



September 18, 2012

VIA ELECTRONIC MAIL

Charles L. Woltmann
Senior Vice President
Law and General Counsel

Sunkist Growers
14130 Riverside Drive
Sherman Oaks, CA 91423-2313
Tel: (818) 379-7532
Fax: (818) 379-7381
cwoltmann@sunkistgrowers.com

Ms. Carmen Santos
Waste Management Division
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Request for Closure Letter
Former Sunkist Citrus Processing Plant
616 E. Sunkist Street
Ontario, California

Dear Ms. Santos:

As you are aware, Sunkist is seeking concurrence of closure from the United States Protection Agency ("EPA") with respect to a PCB risk-based disposal approval application ("Application") under the Toxic Substances Control Act, PCB regulation in 40 CFR 761.61(c). The EPA conditionally approved the original Application on August 19, 2011. Sunkist supplied additional information to the EPA, and the EPA approved two Application amendments in September, 2011.

Sunkist filed a Completion Report associated with these activities on July 12, 2012. All of the activities performed to date to meet EPA requirements contemplated the complete closure of the Site so that the pending sale of the Site to the City of Ontario could occur. Based on conversations on September 12, 2012 between you and Brett Bowyer of Bowyer, Environmental Consulting, Inc. ("BEC"), we understand that the EPA may now be considering a less than complete closure due to concerns about the adequacy of the soil investigations conducted at the Site.

In that regard, we must remind the EPA that BEC and the City's consultant, Leighton and Associates have conducted an extensive series of investigations at the Site, including the collection and PCB analysis of well over 200 discrete soil samples. Not one of these soil samples exhibited a PCB concentration in excess of the risk-based cleanup criteria: 4.5 milligrams per kilogram – mg/kg. In fact, the highest detected concentration of PCBs in soil was 2.38 mg/kg. The only media that exhibited PCB concentrations in excess of the risk-based cleanup criteria was crushed and non-crushed concrete – all of which has been removed from the Site as documented in the Completion Report.

The EPA initially stated that it would provide its Closure Letter by the end of August, 2012. We now understand that the EPA is now targeting September 21, 2012 as the date for the delivery of the Closure Letter.

Time is fast running out for us to complete our pending sale of the Site to the City. We feel that we are entitled to the complete Closure Letter that we have always contemplated, and that such Letter should be delivered very shortly. Please remember that from the first, the EPA has indicated that it would cooperate with us time-wise so as not to delay or prevent a closing of the sale.

Thank you for your prompt attention to this request. Please contact the undersigned if you have any questions. We look forward to receiving the Closure Letter by September 21.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Charles L. Woltmann', with a horizontal line extending to the right.

Charles L. Woltmann
Senior Vice President, Law and
General Counsel

Cc: Brett Bowyer
Keith Rudd



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

Via Electronic and U.S. Postal Service Mail

October 2, 2012

Mr. Charles L. Woltmann
Sr. Vice President, Law and General Counsel
Sunkist Growers, Inc.
14130 Riverside Drive
Sherman Oaks, California 91423

Re: Toxic Substances Control Act (TSCA) Polychlorinated Biphenyls (PCBs) [40 CFR 761.61(c)] - USEPA Approval of the PCB Cleanup Completion Report for the Former Citrus Processing Plant 616 East Sunkist Boulevard, Ontario, California

Dear Mr. Woltmann:

Thank you for submitting the "*Remedial Completion Report Former Citrus Processing Plant 616 East Sunkist Boulevard Ontario, California*" (PCB Cleanup Completion Report [PCCR or Report]) dated June 12, 2012 and prepared by Bowyer Environmental Consulting, Inc (BEC) for Sunkist Growers, Inc. (Sunkist). The U.S. Environmental Protection Agency Region 9 (USEPA) hereby finds that the PCCR demonstrates that cleanup requirements for PCBs were met at the PCB Cleanup Site (PCS) located within the Former Sunkist Citrus Processing Plant (Sunkist Site). USEPA is making this determination based on the "USEPA Review Elements" summarized below and its review of the PCCR. The Sunkist Site is located at 616 East Sunkist Boulevard, Ontario, California.

In general, the PCCR documents the (1) characterization and cleanup (via excavation) of PCBs in soils, (2) characterization of concrete, (3) compliance with the PCB cleanup level at the PCS, and (4) off-site disposal of PCB remediation waste (e.g., soils containing PCBs above the cleanup level) and other wastes containing PCBs. The PCS¹ which is located within the 11.11-acre Sunkist Site is defined in Review Element 1.d, below. USEPA approved a PCB cleanup level for soil and concrete equal to 4.5 milligram/kilogram (mg/kg) total PCBs (as Aroclors).

USEPA Review Elements: PCB Cleanup Completion Report, Former Sunkist Facility

1. General compliance with USEPA's conditions of approval. Sunkist PCB cleanup site (PCS).
Based on USEPA's review of the PCCR, USEPA has determined that:

- a. Sunkist / BEC completed the PCB related work consistent with USEPA's August 19, 2011 conditional approval (Original Approval) of the Sunkist / BEC "*Remedial Action Plan – Former***

¹ USEPA's August 19, 2011 letter (Original Approval) approving the "*Remedial Action Plan - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California*" defined the PCS.

Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California” dated May 22, 2011 (RAP). The RAP is the Sunkist / BEC risk-based disposal approval application (Original Application) for PCBs required under 40 CFR 761.61(c). USEPA’s Original Approval was subsequently amended to address Sunkist’s proposed modifications to the Original Application.² In general, Sunkist / BEC have complied with the conditions of approval in USEPA’s Original Approval and in subsequent Amendments 1 and 2 to the Original Approval.

- b. However, Sunkist / BEC still have to comply with the deed restrictions requirements in Condition 16 of the Original Approval. See Review Element 5, below. Condition 16 required a meeting to discuss the deed restriction in relation to the PCB cleanup that would be recorded for the property. That meeting did not occur. Compliance with condition 16 is required in Review Element 5.b (Land use restrictions), below.
- c. Sunkist’s Application and USEPA’s Approval addressed (1) additional site characterization of PCBs at the PCS, (2) PCB cleanup via excavation, (3) soil cleanup verification sampling and analysis, (4) concrete sampling, (5) ProUCL calculations (soil and concrete), (6) waste disposal, (7) onsite use of concrete from onsite building demolitions, and (8) land use restrictions.
- d. PCS definition. USEPA’s Original Approval defines the PCS as being located within the 11.11-acre Sunkist Site and encompassing all the areas of the Sunkist Site investigated for PCBs including and not limited to:
 - the former location of certain buildings and their associated basements that had been already demolished before the date of the Original Approval, as well as,
 - the location of buildings and related basements that at the time of the Original Approval were awaiting demolition

In addition, the PCS encompasses the areas where concrete derived from the demolition of Site buildings was stockpiled at the time of the Original Approval. And based on USEPA’s Amendments 1 and 2 to the Original Approval, the PCS also encompasses the area of the former waste water treatment plant within the Sunkist Site, soil beneath basement concrete stockpiles, and Site Areas 24C, D-5-1, L-13-3, B-5-1, and D-1-1.

- 2. Additional Sunkist Site characterization.** USEPA has determined that Sunkist / BEC complied with the conditions in USEPA’s Original Approval and subsequent amendments to the Original Approval and Application; and applicable regulatory requirements in 40 CFR 761. This determination is based on USEPA’s review of additional characterization data collected at the PCS for PCBs under TSCA and included in the PCCR.

² USEPA’s correspondence amending USEPA’s August 19, 2011 approval letter (Original Approval) and the Sunkist Application include letters dated September 6, 2011 (approving Sunkist’s August 31 and September 2, 2011 proposed modifications to the Original Application); and USEPA’s September 23, 2011 letter (approving Sunkist’s September 12, 2011 proposed modifications to the Original Application). All USEPA’s approval letters established conditions to be met by Sunkist / BEC.

3. PCB Cleanup level for soil and concrete. PCB cleanup verification. Pro UCL calculations.

Compliance with PCB cleanup level. USEPA approved a cleanup level of 4.5 mg/kg total PCBs (as Aroclors) for soils and concrete at the PCS. This cleanup level is based on a site-specific risk assessment and was developed taking into consideration analytical results for PCB Aroclors and dioxin-like PCB congeners. The approved PCB cleanup level is protective of industrial and construction worker exposure scenarios evaluated for receptors in proximity to the Sunkist Site. The land comprising the Sunkist Site is currently zoned industrial.

USEPA has evaluated the total PCB concentrations remaining in soils at the PCS. USEPA has also reviewed the calculations of the 95% upper confidence limit of the mean (95% UCL)³ of PCB analytical results for (1) soils and (2) onsite concrete used in backfilling basement areas and excavations at the Sunkist Site. The concrete was generated from demolition of onsite structures and stockpiled at the Sunkist Site for onsite reuse or offsite disposal. Based on the (1) PCB analytical results for soil cleanup verification and stockpiled concrete samples reported in the PCCR and (2) associated 95% UCL, USEPA has determined that:

- a. Sunkist / BEC have achieved the PCB cleanup level at the PCS and complied with the PCB cleanup requirements for soils and concrete. The PCB levels in concrete for reuse onsite were below the 4.5 mg/kg PCB cleanup level based on the 95% UCL. Therefore, the concrete was not subject to cleanup or decontamination before reuse.
- b. The concrete that originated from the demolition of onsite structures can be reused within the boundaries of the Sunkist Site consistent with TSCA use authorizations in 40 CFR 761.30(u) (Use of decontaminated materials). The 95% UCL of the mean of concrete PCB analytical results is below the PCB cleanup level.

4. Waste disposal. As the generators of the waste, Sunkist / BEC must ensure that: (1) all waste disposal documentation has been included in the PCCR, (2) such documentation is complete and accurate, and (3) disposal of PCB remediation waste and other PCB-containing wastes was conducted in compliance with the TSCA regulations, other federal regulations that may apply, and state and local regulatory requirements. USEPA acknowledges that Appendix G of the PCCR contains waste disposal documentation (e.g., waste manifests) associated with the PCB cleanup.

5. Land use restrictions. Approval Condition 16 in August 19, 2011 Original Approval. Based on USEPA's review of the additional site characterization data collected at the PCS under TSCA and included in the PCCR, USEPA has determined that:

- a. Land use restrictions are necessary. If in the future the land use changes from industrial to unrestricted use (e.g., residential use), additional cleanup of PCBs in soils and concrete shall be

³ The UCL was calculated using the USEPA ProUCL statistical program. The UCL is the exposure point concentration (EPC) used to determine compliance of the PCB cleanup with the cleanup level of 4.5 mg/kg total PCBs (as Aroclors).

Mr. Charles L. Woltmann
Sunkist Growers, Inc.
Re: TSCA Risk-Based PCB Cleanup Report
Date: October 2, 2012

conducted and such cleanup must result in residual PCB concentrations that are protective of the new land use for the former Sunkist Site.

- b. Condition 16. Within 60 days after the date of this letter, Sunkist / BEC must submit a draft restrictive covenant for USEPA review. Sunkist / BEC must schedule a meeting with USEPA to discuss the technical aspects of the restrictive covenant directly related to the PCB cleanup.

Consistent with the above review, USEPA concludes that no further cleanup of PCBs is necessary at the PCS within the Sunkist Site. However, USEPA may require additional investigation and cleanup of PCBs if (1) a finding is made after the date of this letter that PCBs remain at the PCS or other areas of the Sunkist Site at concentrations above 4.5 mg/kg total PCBs and / or (2) the land use is changed to unrestricted use. The PCS encompasses several areas within the 11.11-acre Sunkist Site that were the subject of investigations and remediation (as deemed necessary) under TSCA.

USEPA appreciates Sunkist / BEC's implementation and completion of the PCB cleanup at the former Sunkist Citrus Processing Plant in Ontario, California. USEPA looks forward to meeting with Sunkist / BEC on the restrictive covenant and to receiving the draft covenant for review. If you have any questions concerning this letter, please call Carmen D. Santos at 415.972.3360.

Sincerely,


for Jeff Scott, Director
Waste Management Division

Cc Via Electronic Mail Only

Keith Rudd, Sunkist Growers, Inc.
keithrudd@comcast.net

Brett Bowyer, BEC
brettbowyer@bowyerenvironmental.com

Charity Hernandez, City of Ontario
chernandez@ci.ontario.ca.us

Curtis Brundidge, County
cbrundage@sbcfire.org

Arlene Kabei, USEPA R9
kabei.arlene@epa.gov

Mr. Charles L. Woltmann
Sunkist Growers, Inc.
Re: TSCA Risk-Based PCB Cleanup Report
Date: October 2, 2012

Steve Armann, USEPA R9
armann.steve@epa.gov

Carmen D. Santos, USEPA R9
santos.carmen@epa.gov



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

August 19, 2011

Mr. Keith Rudd
Sunkist Growers, Inc.
Director of Environmental and Technology
531 West Popular Avenue
Tipton, CA 93272

**Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) –
USEPA Conditional Approval of "Remedial Action Plan," Former Sunkist Citrus Plant**

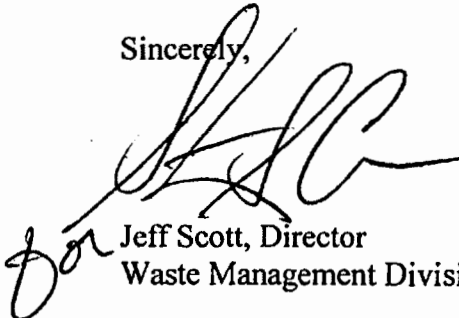
Dear Mr. Rudd:

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the "*Remedial Action Plan*" (RAP) for the Former Sunkist Citrus Processing Plant at 616 East Sunkist Boulevard in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk-based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the Sunkist PCB Cleanup Site (PCS) encompassed within the 11.11-acre Sunkist Site.

USEPA is approving the RAP (Application) under 40 CFR 761.61(c). Among other things, the Application involves additional characterization sampling for PCBs in soils and concrete, cleanup of PCB-contaminated soils via excavation if necessary, offsite disposal of PCB remediation waste (e.g., soils, concrete), and onsite use of concrete with PCB levels equal to or below 4.5 milligrams/kilograms (mg/kg). USEPA is approving a PCB cleanup level for soils and concrete at the Site equal to 4.5 mg/kg total PCBs which was developed by Sunkist / BEC via a site-specific health risk assessment.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,



for Jeff Scott, Director
Waste Management Division

Keith Rudd
Re: USEPA Conditional Approval – TSCA PCB Cleanup
Former Sunkist Citrus Processing Plant, Ontario, California
Date: August 19, 2011

Enclosures (2)

Cc: Steve Armann, USEPA R9
Carmen Santos, USEPA R9



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

August 19, 2011

**USEPA Conditional Approval for Former Sunkist Citrus Processing Plant
616 East Sunkist Boulevard
Ontario, California
TSCA PCB Cleanup Under 40 CFR 761.61(c)**

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "*Remedial Action Plan*" (RAP) for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California, dated May 22, 2011 and prepared by Bowyer Environmental Consulting (BEC) for Sunkist Growers, Inc. (Sunkist). Sunkist has submitted the RAP under the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR 761.61(c) (risk-based PCB cleanup). As such, the RAP is the risk-based disposal approval application required under that section of the TSCA regulations for the cleanup of PCBs. The RAP (Application) addresses additional characterization sampling and cleanup of PCBs at the Former Sunkist Plant in Ontario, California (Sunkist Site).

This approval is effective on the date of this enclosure. Section C below contains the conditions of approval.

Any party cleaning up PCBs from soils and structures must do so consistent with the requirements set forth at 40 CFR 761.61. The TSCA PCB regulations in 40 CFR 761.61 establish PCB cleanup options consisting of self-implementing (40 CFR 761.61(a)), performance-based (40 CFR 761.61(b)), or risk-based (40 CFR 761.61(c)) cleanup alternatives. Depending on site-specific factors, USEPA may approve and require implementation of a PCB cleanup following a hybrid approach that applies requirements from multiple cleanup options.

USEPA is approving the Application with conditions under the TSCA regulatory requirements for PCBs in 40 CFR 761.61(c) and 40 CFR 761.61(a).

B. Former Sunkist Citrus Processing Plant, Sunkist PCB Cleanup Site, Land Use, Sources of PCB Contamination, and PCB Cleanup

- 1. Sunkist Site and Sunkist PCB Cleanup Site.** The Sunkist Site consists of approximately 11.11 acres in the City of Ontario. The Sunkist PCB Cleanup Site (PCS) is located within the Sunkist Site.

2. **Current and future land use.** According to the Application, the current land use at the Sunkist Site is industrial and the future land use is expected to be industrial. The Sunkist Site operated as a citrus processing plant from 1926 (operated by Sunkists' predecessor Ontario Citrus Exchange) and completed citrus processing operations in 2008. The onsite wastewater treatment plant is still operating at the Site
3. **Sources of PCB Contamination.** Among potential sources of contamination is hydraulic equipment that may have been lubricated with PCB-containing oils. PCB Aroclors 1254 and 1260 have been detected at the site in concrete and soils. In addition, based on a small number of soil samples, dioxin-like PCB congeners were detected at the Site.
4. **PCB Cleanup.** Among other requirements, the conditions of approval for the PCB cleanup at the Sunkist Site require that Sunkist:
 - Submit additional information concerning further characterization of PCBs in concrete stockpiled in certain areas of the PCS and in building basements.
 - Conduct additional soil characterization.
 - Excavate and dispose offsite (consistent with 40 CFR 761.61(a)) soils, concrete, and asphalt contaminated with PCBs above the USEPA-approved PCB cleanup level of 4.5 mg / kg. This includes any soils contaminated with PCBs above the cleanup level that may be present beneath concrete or asphalt.
 - Conduct soil cleanup verification sampling and analysis in accordance with the required SAP (to be approved under 40 CFR 761.61(c)).
 - Verify compliance with the cleanup level via use of USEPA's ProUCL statistical program.
 - Dispose offsite other cleanup wastes in accordance with 40 CFR 761.61(a).
 - Use onsite concrete that is contaminated with PCBs below the cleanup level.
 - Submit for USEPA approval a PCB Cleanup Completion Report.
 - Restrictive covenant recorded in accordance with state law that among other information documents the onsite use of concrete with PCBs below the PCB cleanup level of 4.5 mg/kg.

C. USEPA's Conditions of Approval

This conditional approval does not relieve the owner and the cleanup party from complying with all other applicable federal, state, and local regulations and permits. Sunkist and BEC must comply with the specified PCB cleanup requirements in 40 CFR 761.61(c), PCB remediation waste disposal requirements in 40 CFR 761.61(a), and the approved Application (i.e., RAP) as modified by the conditions of approval herein.

Departure from the approval conditions herein without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in

this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval. This approval only applies to the Sunkist Site. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Sunkist Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB cleanup levels or if PCBs are found at other areas of the Sunkist Site.

USEPA is hereby approving the Application as modified by the conditions of approval established below. Sunkist and BEC must implement the Application as modified by these conditions.

In this approval, deadlines are based on a specific number of business days from the date of the approval.

1. **Sunkist PCB Cleanup Site.** The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.
2. **PCB cleanup level for soils and concrete.** The approved PCB cleanup level for soils and concrete is 4.5 milligrams / kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance.¹ The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.
3. **Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples.** Within 5 days after the date of this approval, Sunkist / BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant. . .). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), Subject: Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), Subject: Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist / BEC conduct the following steps:

- a. Sunkist / BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist / BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist / BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist / BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist / BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

4. **Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements.** USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61(a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a. Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist / BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist / BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist / BEC shall resubmit Figure 10 depicting the soil sampling locations in

the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

5. **Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP).** Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.
6. **Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP).** USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.
7. **Soil beneath concrete stockpiles.** Sunkist / BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist / BEC shall submit for review and approval the sampling approach to make this verification.
8. **Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs.** Equipment not covered in the USEPA Region 1 SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).
9. **Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes.** Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.
10. **Dust management plan.** Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist / BEC shall propose a concentration (in mg / m³)

of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

- 11. Extraction and analytical methods. Field and laboratory quality control samples.** Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA for both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist / BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

- 12. Notification of PCB activity.** Sunkist / BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist / BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist / BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

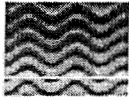
The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist / BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

- 13. Demonstration of compliance with concrete and soil cleanup level.** Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

For concrete in stockpiles and / or placed in former building basements, Sunkist / BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist / BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist / BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

- 14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP).** Sunkist / BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist / BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.
- 15. PCB Cleanup Completion Report.** Within 60 days after Sunkist / BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist / BEC must submit a PCB Cleanup Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist / BEC shall refer to 40 CFR 761.61(a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist / BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.
- 16. Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.



**Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB
Remediation Goals**

Patrick Wilson to: Carmen Santos

08/05/2011 06:00 PM

From: Patrick Wilson/R9/USEPA/US
To: Carmen Santos/R9/USEPA/US@EPA

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of $1E-5$. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency

approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.

Congener Analysis

Brett Bowyer

to:

Carmen Santos

02/21/2011 06:13 PM

Cc:

"Rudd, Keith"

Show Details

Hello Carmen,

Following our discussions last Wednesday, I checked my records and believe that I never sent you the official request to move forward with the congener analysis. My apologize on this, I thought that I had already made the request.

In any event, as we discussed during our conference call, you will approve the analysis of 5% of the total samples tested. During the demolition process, a total of 45 AOC soil samples and 51 crushed concrete sampled (96 total samples). As such, we have selected the two highest soil and three highest concrete samples for PCB congener analysis. These samples are:

- A-4-1 (soil): 2.02 mg/kg;
- L-13-3 (soil): 2.37 mg/kg;
- SPC-CC-16: 27.2 mg/kg;
- SPC-CC-39: 9.28; and
- SPC-CC-40: 14.0 mg/kg.

Please confirm that the analyses of these samples is as per our discussions and we will get these started right away.

Thanks

Brett Bowyer, P.G.

Bowyer Environmental Consulting, Inc.

17011 Beach Boulevard, Suite 900

Huntington Beach, CA 92647

Office: (877) BEC-INC-0

(877) 232-4620

Cell: (714) 878-7191

FAX: (714) 840-4963

brettbowyer@bowyerenvironmental.com

www.bowyerenvironmental.com

This message contains information that may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete this message completely from your computer system. Thank you.

ABC Environmental Laboratories

Mr. Brett Bowyer
Bowyer Environmental
16458 Balsa Chica St., #422
HB, CA 92649

2/21/2011

Project: Sunkist
Project Site: Sunkist
Sample Date: 2/17/2011
Lab Job No.: B11B017

Dear Mr. Bowyer,

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 2/17/2011 and analyzed by the following EPA methods:

EPA 8082(PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custody record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.
Laboratory Director



This cover letter is an integral part of this analytical report.

ABC Environmental Laboratories

| | | | |
|--------------------|----------------------|-----------------|-----------|
| Client: | Bowyer Environmental | Lab Job No.: | B11B017 |
| Project: | Sunkist | Date Sampled: | 2/17/2011 |
| Project Site: | Sunkist, Ontario | Date Received: | 2/17/2011 |
| Matrix: | Solid | Date Extracted: | 2/17/2011 |
| Extraction Method: | EPA 3550B | Date Analyzed: | 2/18/2011 |
| Batch No.: | 0218-PCB-S | Date Reported: | 2/21/2011 |

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

| DILUTION FACTOR | | 1 | 1 | 1 | 1 |
|------------------------------------|----|---------------|-------------|---------------|-------------|
| LAB SAMPLE I.D. | | B11B017-1 | B11B017-2 | B11B017-3 | B11B017-4 |
| CLIENT SAMPLE I.D. | | B12-B-B3-S1/2 | B12-B-C3-S3 | B12-B-B8-S1/2 | B12-B-B3-S4 |
| COMPOUND | RL | | | | |
| PCB-1016 | 25 | ND | ND | ND | ND |
| PCB-1221 | 50 | ND | ND | ND | ND |
| PCB-1232 | 25 | ND | ND | ND | ND |
| PCB-1242 | 25 | ND | ND | ND | ND |
| PCB-1248 | 25 | ND | ND | ND | ND |
| PCB-1254 | 25 | ND | ND | ND | ND |
| PCB-1260 | 25 | ND | ND | ND | ND |
| Surrogate Recovery (%) QC Limit | | 65-140 | | | |
| 2,4,5,6-Tetrachloro-m-xylene | | 92 | 92 | 87 | 71 |
| Decachlorobiphenyl | | 101 | 89 | 85 | 72 |

ND: Not Detected (Below RL).

ABC Environmental Laboratories

| | | | |
|--------------------|----------------------|-----------------|-----------|
| Client: | Bowyer Environmental | Lab Job No.: | B11B017 |
| Project: | Sunkist | Date Sampled: | 2/17/2011 |
| Project Site: | Sunkist, Ontario | Date Received: | 2/17/2011 |
| Matrix: | Solid | Date Extracted: | 2/17/2011 |
| Extraction Method: | EPA 3550B | Date Analyzed: | 2/18/2011 |
| Batch No.: | 0218-PCB-S | Date Reported: | 2/21/2011 |

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

| DILUTION FACTOR | | 1 | 1 | 1 | 1 |
|------------------------------------|----|-------------|---------------|-------------|----------------|
| LAB SAMPLE I.D. | | B11B017-5 | B11B017-6 | B11B017-7 | B11B017-8 |
| CLIENT SAMPLE I.D. | | B12-B-B8-S5 | B12-B-E3-S1/2 | B12-B-E3-S5 | B12-B-B4-S31/2 |
| COMPOUND | RL | | | | |
| PCB-1016 | 25 | ND | ND | ND | ND |
| PCB-1221 | 50 | ND | ND | ND | ND |
| PCB-1232 | 25 | ND | ND | ND | ND |
| PCB-1242 | 25 | ND | ND | ND | ND |
| PCB-1248 | 25 | ND | ND | ND | ND |
| PCB-1254 | 25 | ND | ND | ND | ND |
| PCB-1260 | 25 | ND | ND | ND | ND |
| Surrogate Recovery (%) QC Limit | | 65-140 | | | |
| 2,4,5,6-Tetrachloro-m-xylene | | 96 | 114 | 99 | 91 |
| Decachlorobiphenyl | | 90 | 115 | 98 | 92 |

ND: Not Detected (Below RL).

ABC Environmental Laboratories

| | | | |
|--------------------|----------------------|-----------------|-----------|
| Client: | Bowyer Environmental | Lab Job No.: | B11B017 |
| Project: | Sunkist | Date Sampled: | 2/17/2011 |
| Project Site: | Sunkist, Ontario | Date Received: | 2/17/2011 |
| Matrix: | Solid | Date Extracted: | 2/17/2011 |
| Extraction Method: | EPA 3550B | Date Analyzed: | 2/18/2011 |
| Batch No.: | 0218-PCB-S | Date Reported: | 2/21/2011 |

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

| DILUTION FACTOR | | 1 | 1 | | |
|---|----|---------------|---------------|--|--|
| LAB SAMPLE I.D. | | B11B017-9 | B11B017-10 | | |
| CLIENT SAMPLE I.D. | | B12-B-C3-S1/2 | B12-B-B4-S1/2 | | |
| COMPOUND | RL | | | | |
| PCB-1016 | 25 | ND | ND | | |
| PCB-1221 | 50 | ND | ND | | |
| PCB-1232 | 25 | ND | ND | | |
| PCB-1242 | 25 | ND | ND | | |
| PCB-1248 | 25 | ND | ND | | |
| PCB-1254 | 25 | ND | ND | | |
| PCB-1260 | 25 | ND | ND | | |
| Surrogate Recovery (%) QC Limit: 65-140 | | | | | |
| 2,4,5,6-Tetrachloro-m-xylene | | 105 | 78 | | |
| Decachlorobiphenyl | | 107 | 83 | | |

RL: Reporting Limit.

ND: Not Detected (Below Dilution Factor x RL).

ABC Environmental Laboratories

EPA 8082 (PCBs) Batch QA/QC Report

Client: Bowyer Environmental
Project: Sunkist
Matrix: Solid
Batch No.: 0218-PCB-S

Lab Job No.: B11B017
Lab Sample ID: B11B017-10
Date Analyzed: 2/18/2011
Date Reported: 2/21/2011

I. MS/MSD Report

Unit: ug/kg

| Analyte | Sample Conc. | Spike Conc. | MS | MSD | MS %Rec. | MSD %Rec. | %RPD | %RPD Accept Limit | %Rec. Accept Limit |
|------------------------|--------------|-------------|-----|-----|----------|-----------|------|-------------------|--------------------|
| PCB-1254 | ND | 500 | 514 | 464 | 103 | 93 | 10 | ≤30 | 70-135 |
| Surrogate Recovery (%) | | | | | | | | | |
| 2,4,5,6-TMX | | | | | 96 | 102 | | | 65-140 |
| Decachlorobiphenyl | | | | | 72 | 75 | | | 65-140 |

II. MB/LCS Report

Unit: ug/kg

| Analyte | Method Blank | Report Value | True Value | Rec.% | Accept Limit |
|------------------------|--------------|--------------|------------|-------|--------------|
| PCB-254 | ND | 446 | 500 | 89 | 75-130 |
| Surrogate Recovery (%) | | | | | |
| 2,4,5,6-TMX | 91 | | | 81 | 65-140 |
| Decachlorobiphenyl | 86 | | | 79 | 65-140 |

ND: Not Detected (Below RL).

MB: Method Blank.

| | | | | | | | | |
|--------------|--|--|-------------------|---|--|--|---|-----------|
| Matrix Code: | DW=Drinking Water GW=Ground Water WW=Waste Water SD=Solid Waste | SL=Sludge SS=Soil/Sediment AR=Air PP=Pure Product | Preservative Code | IC=Ice HC=HCl HN=HNO ₃ | SH=NaOH ST=Na ₂ S ₂ O ₃ HS=H ₂ SO ₄ | * Sample Container Types: T=Tedlar Air Bag G=Glass Container ST= Steel Tube | B= Brass Tube P=Plastic Bottle V=VOA Vial | E= EnCore |
|--------------|--|--|-------------------|---|--|--|---|-----------|

Additional Sampling at Building 12

Brett Bowyer

to:

Carmen Santos

01/11/2011 10:48 AM

Cc:

"Keith Rudd"

Show Details

January 18, 2011
5:00 pm

Hello,

As per our discussion yesterday, I'm providing a plan to collect additional data from Basement 12. There were three samples of concrete collected from the floor of the basement on November 27, 2010, prior to the demolition of the building. These samples and detected PCB concentrations are listed as follows:

| Sample Identification | Location Description | | |
|-----------------------|---|----------------------|----------------------|
| | | Aroclor 1254 (mg/kg) | Aroclor 1260 (mg/kg) |
| B12-A | Stained Concrete Under Gain Control - Southwest Corner of Basement | 0.204 | 0.0615 |
| B12-B | Grout Between Cement Slabs - Middle of Basement | 0.340 | 0.0865 |
| B12-C | Stained Concrete By Lighting Transformer - Northeast Corner of Basement | 0.182 | 0.0903 |

} Red locations

All other aroclors were none detect (0.05 to 0.025 mg/kg).

The proposed grid-based sampling necessary to completely surround these three location is shown on the attached Figure 1. Based on the relatively low concentrations of PCBs observed in the three samples collected, we are proposing to collect samples from 10 selected grid locations as shown on Figure 1 (Green Locations). Concrete samples will be collected from each of these additional locations at depths of 0.0 to 0.5 inches per the guidelines presented in the EPA Region I Standard Operating Procedures for Sampling of Porous Surfaces for Polychlorinated Biphenyls, signed on October 21, 2008 (Guidelines). A copy of the Guideline is also attached.

In addition, as we discussed a concrete sample will also be collected at each of the original sampling locations at a depth of 1.0 to 1.5 inches (red locations on Figure 1).

Once these results are obtained, soil will be sampled from beneath the three concrete locations that exhibit the highest concentrations of PCBs. It is proposed that two samples are to be collected from each of these three locations at depths of 0.5 to 1.0 and from 2.0 to 2.5 feet beneath the existing concrete. As such, a total of six soil samples will be collected.

All of the collected concrete and soil samples will be analyzed for PCBs by EPA Method 8082.

Please confirm that the attached is consistent with what we discussed yesterday and we will proceed with the sampling program right away.

Thank you.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Office: (877) BEC-INC-0
(877) 232-4620
Cell: (714) 878-7191

FAX: (714) 840-4963

brettbowyer@bowyerenvironmental.com

www.bowyerenvironmental.com

This message contains information that may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete this message completely from your computer system. Thank you.



Project Summary
Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California

November 30, 2010



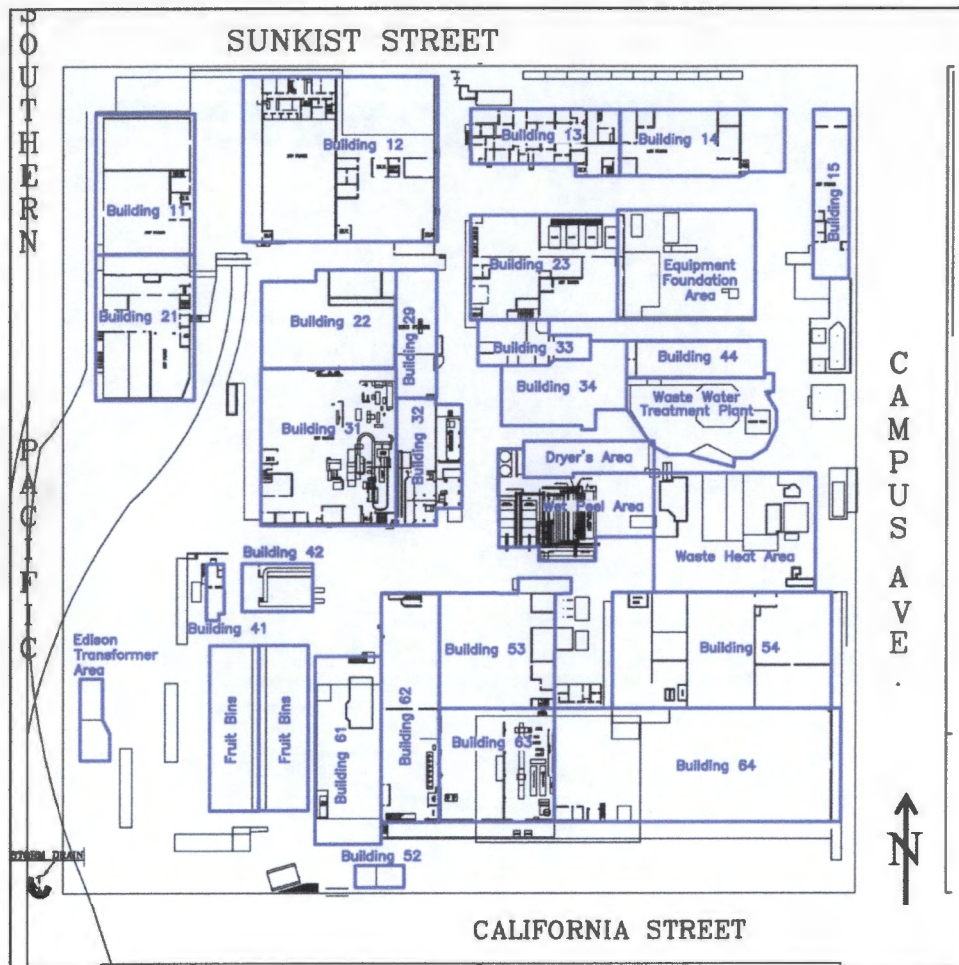
- **1882** - First Orange Grove Planted in Ontario
- **1925** – California Fruit Growers Exchange (Sunkist's Predecessor) purchased the property
- **1926** - Plant First Developed in 1926
- **1928** - Over 14,000 Acres of Land in Ontario Utilized to Grow Citrus
- **1945** – Citrus industry in Ontario Begins to Decline in Response to Increased Land Values (Increased Residential Demands)
- **2008** – Sunkist Terminates Operations at Site

Slide 2

Property History

Former Sunkist Citrus Processing Plant
616 East Sunkist Street, Ontario, California





- **Original (1920s) Operations Included:**

- Canning;
- Evaporation;
- Cold Storage; and
- Warehousing.

- **Expanded in the 1940s.**

- **Modernized in the 1980.**

- **As of 2008 Operations had been Expanded to Include:**

- Twenty-three buildings;
- Waste Water Treatment Plant
- Wet Peel Areas;
- Fenced Edison Substation; and
- Above- and Below-Grade Tanks (Ammonia, Caustic, Citrus oil, Citrus Peel Liquor, Condensate, Fresh Water, Juice, Lime, Phosphoric Acid, Sugar, Sludge, Soap, Spent Caustic, and Waste Water).

Slide 3

Plant History

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





- **2008** – Sunkist Operations Terminated.
- **2008** – Agreement Between Sunkist and the City of Ontario Signed.
- **August-September 2008** – City Consultant (Leighton) Performs Phase I.
- **October-November 2008** – City Consultant (Leighton) Implements Phase II.
- **April-July 2009** – Sunkist Consultant (BEC) Implements Initial Soil Removal Actions.
- **August-September 2009** – Sunkist Consultant (BEC) Implements Subsurface Data Gap Investigation.

Slide 4

Pre-Demolition Investigations/Remedial Actions

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





- Forty-eight Soil Vapor Samples.
- Installed in a Modified Five-Spot, 200 Foot Grid Pattern.
- Samples Collected at 5 and 15 feet below ground surface.
- Two 5.0 foot Samples Contained PCE Slightly Above Commercial/Industrial CHHSL.
- One 5.0 foot Sample Contained Carbon Tetrachloride Slightly Above Commercial/Industrial CHHSL.
- No Sample Contained Cumulative Carcinogenetic Risk of $> 1 \times 10^{-5}$.

Slide 5

Soil Vapor Survey

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California



Subsurface Vapor Samples

| Soil Vapor Location | Depth (feet) | Date Installed | Date Sampled | Benzene | Carbon Tetrachloride | Chloroform | Dichlorodifluoromethane | 1,1-Dichloroethene | Tetrachloroethene | Toluene | 1,1,1-Trichloroethane | Trichloroethene | Trichlorofluoromethane | Estimated Incremental Cancer Risk (Detected Compounds) |
|---------------------|--------------|----------------|--------------|---------|----------------------|------------|-------------------------|--------------------|-------------------|---------|-----------------------|-----------------|------------------------|--|
| VP-1.5 | 4 | 8/10/2009 | 8/11/2009 | <0.008 | 0.061 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 7E-07 |
| VP-2.5 | 5 | 8/12/2009 | 8/13/2009 | <0.008 | 0.079 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.027 | 9E-07 |
| VP-2-15 | 15 | 8/12/2009 | 8/13/2009 | NS | NS | NS | NS | NS | NS | NS | NS | NS | NS | NA |
| VP-3.5 | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-4.5 | 5 | 8/10/2009 | 8/10/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.037 | NA |
| VP-4-15 | 15 | 8/10/2009 | 8/10/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.082 | NA |
| VP-5.5 | 5 | 8/12/2009 | 8/13/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-5-15 | 14 | 8/12/2009 | 8/13/2009 | NS | NS | NS | NS | NS | NS | NS | NS | NS | NS | NA |
| VP-6.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.018 | <0.008 | <0.008 | 0.039 | 5E-11 |
| VP-7.5 | 5 | 8/12/2009 | 8/13/2009 | <0.008 | <0.008 | <0.008 | <0.008 | 0.046 | 0.213 | <0.008 | <0.008 | 0.080 | 0.126 | 4E-07 |
| VP-7-15 | 15 | 8/12/2009 | 8/13/2009 | <0.008 | <0.008 | <0.008 | <0.008 | 0.146 | 0.304 | <0.008 | <0.008 | 0.231 | 0.309 | 6E-07 |
| VP-8.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.028 | <0.008 | <0.008 | <0.008 | 0.196 | 5E-08 |
| VP-9.5 | 5 | 8/10/2009 | 8/11/2009 | <0.008 | 0.092 | <0.008 | 0.178 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 1E-06 |
| VP-9-15 | 15 | 8/10/2009 | 8/11/2009 | <0.008 | 0.263 | <0.008 | 0.044 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.026 | 9E-06 |
| VP-10.5 | 5 | 8/12/2009 | 8/13/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-11.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.026 | <0.008 | <0.008 | <0.008 | 7E-11 |
| VP-11-15 | 15 | 8/11/2009 | 8/12/2009 | <0.008 | 0.071 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.142 | 8E-07 |
| VP-12.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | 0.754 | 2.22 | 0.064 | <0.008 | 0.085 | 0.220 | 4E-06 |
| VP-13.5 | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-14.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | 0.072 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.126 | 9E-07 |
| VP-14-15 | 15 | 8/11/2009 | 8/12/2009 | <0.008 | 0.094 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.204 | 1E-06 |
| VP-15.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | 0.062 | <0.008 | <0.008 | 0.474 | 0.992 | <0.008 | <0.008 | 0.031 | 0.226 | 1E-06 |
| VP-16.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-16-16 | 16 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.025 | <0.008 | <0.008 | <0.008 | 0.044 | 4E-08 |
| VP-17.5 | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-18.5 | 5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.042 | <0.008 | <0.008 | <0.008 | 1E-10 |
| VP-18-15 | 15 | 8/11/2009 | 8/12/2009 | <0.008 | 0.073 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.049 | <0.008 | <0.008 | 9E-07 |
| VP-19.5 | 5 | 8/10/2009 | 8/12/2009 | <0.008 | 0.067 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.138 | 8E-07 |
| VP-20.5 | 5 | 8/12/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.031 | <0.008 | <0.008 | <0.008 | 0.117 | 5E-08 |
| VP-20-15 | 15 | 8/12/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.041 | <0.008 | <0.008 | <0.008 | 0.221 | 7E-08 |
| VP-21A-5 | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-21B-15 | 15 | 8/12/2009 | 8/12/2009 | NS | NS | NS | NS | NS | NS | NS | NS | NS | NS | NA |
| VP-22.5 | 5 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-23.5 | 5 | 8/12/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 2.91 | NA |
| VP-23-15 | 15 | 8/12/2009 | 8/12/2009 | <0.008 | 0.075 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.537 | 9E-07 |
| VP-24.5 | 5 | 8/11/2009 | 8/13/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-25.5 | 5 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-25-15 | 15 | 8/11/2009 | 8/11/2009 | <0.008 | 0.121 | <0.008 | <0.008 | <0.008 | 0.020 | <0.008 | <0.008 | <0.008 | 0.009 | 1E-06 |
| VP-26.5 | 5 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | NA |
| VP-27.5 | 5 | 8/12/2009 | 8/13/2009 | 0.111 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.158 | <0.008 | <0.008 | 0.128 | 9E-07 |
| VP-27-15 | 15 | 8/12/2009 | 8/13/2009 | <0.008 | 0.117 | 0.040 | 0.376 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.313 | 1E-06 |
| VP-28.5 | 5 | 8/12/2009 | 8/13/2009 | 0.026 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.076 | 2E-07 |
| VP-29.5 | 5 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.064 | <0.008 | 0.010 | 2E-11 |
| VP-30.5 | 5 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.050 | NA |
| VP-30-15 | 15 | 8/11/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.092 | NA |
| VP-31.5 | 5 | 8/11/2009 | 8/11/2009 | 0.061 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 5E-07 |
| VP-32.5 | 4.5 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.022 | <0.008 | <0.008 | 0.012 | 6E-11 |
| VP-32-15 | 15 | 8/11/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.108 | NA |

QA/QC Samples

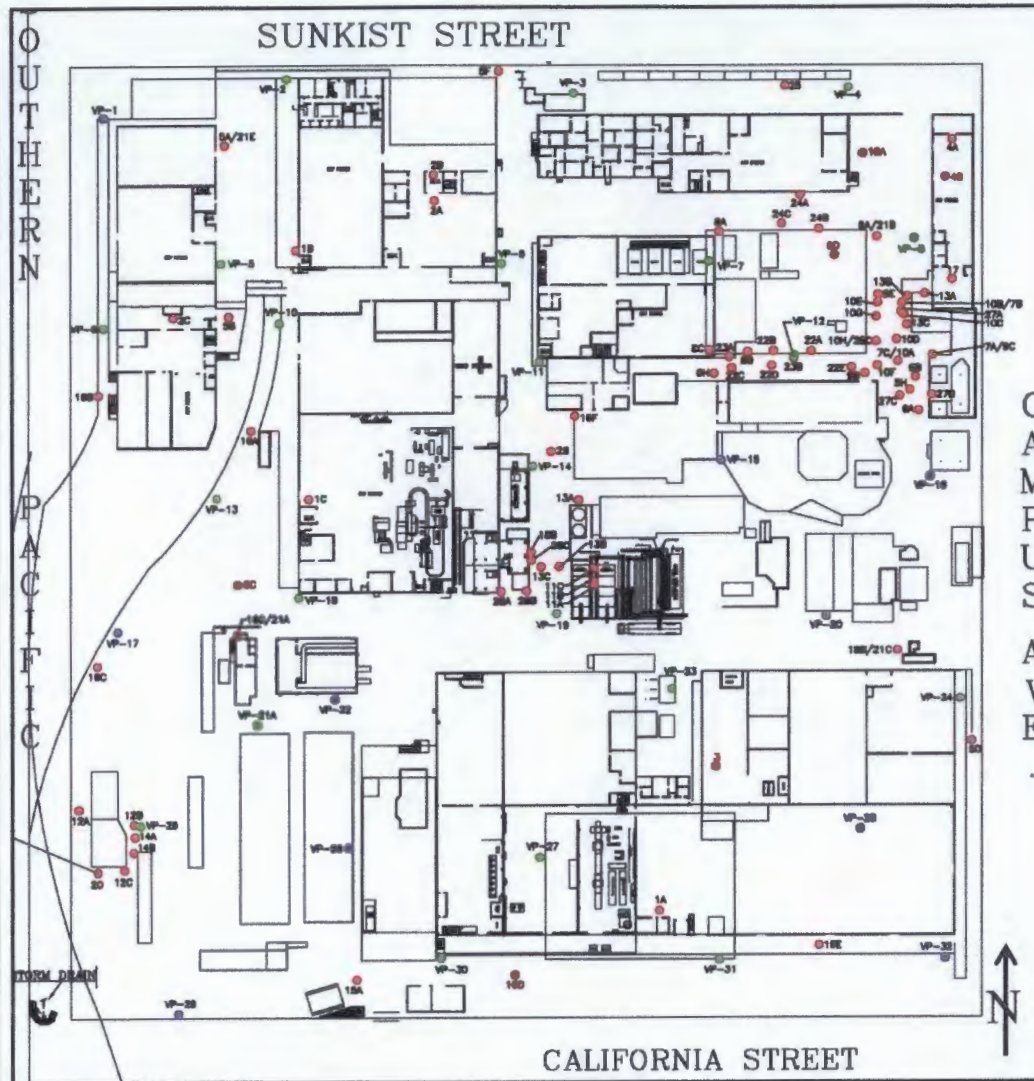
| | | | | | | | | | | | | | |
|----------------|----|-----------|-----------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| VP-4-15 (Dup) | 15 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.096 |
| VP-23-15 (Dup) | 15 | 8/12/2009 | 8/12/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.603 |
| VP-2-5 (Dup) | 5 | 8/12/2009 | 8/13/2009 | <0.008 | 0.081 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | 0.027 |
| VP-1.5 (1P) | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 |
| VP-1.5 (7P) | 5 | 8/10/2009 | 8/11/2009 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 | <0.008 |

Screening Criteria

| | | | | | | | | | | |
|------------------------------|--------|--------|----|----|----|-------|-----|-------|-------|----|
| Commercial/Industrial CHHSLs | 0.122 | 0.0846 | NA | NA | NA | 0.608 | 378 | 2,790 | 1.77 | NA |
| Residential CHHSLs | 0.0362 | 0.0251 | NA | NA | NA | 0.180 | 135 | 991 | 0.528 | NA |

Slide 6
Soil Vapor Survey Results
 Former Sunkist Citrus Processing Plant
 616 East Sunkist Street, Ontario, California





- **Seventy-Nine Soil Borings (Shown in Red) Drilled at Identified Areas of Concern – Composited Samples analyzed for VOCs, SVOCs, PCBs, CAM Metals and TPHs.**
- **Thirty-Two Borings (Shown in Green and Blue) Installed in a Modified Five-Spot, 200 Foot Grid Pattern (Outside of Focused Sampling Areas) – Discrete Soil Samples Analyzed for VOCs, PNAs, PCBs, pesticides, CAM Metals and TPHs.**
- **Three Removal Areas Identified Based on the Presence of PCBs (Two Areas) and Lead (One Area) at concentrations in Excess of Commercial/Industrial CHHSLs.**

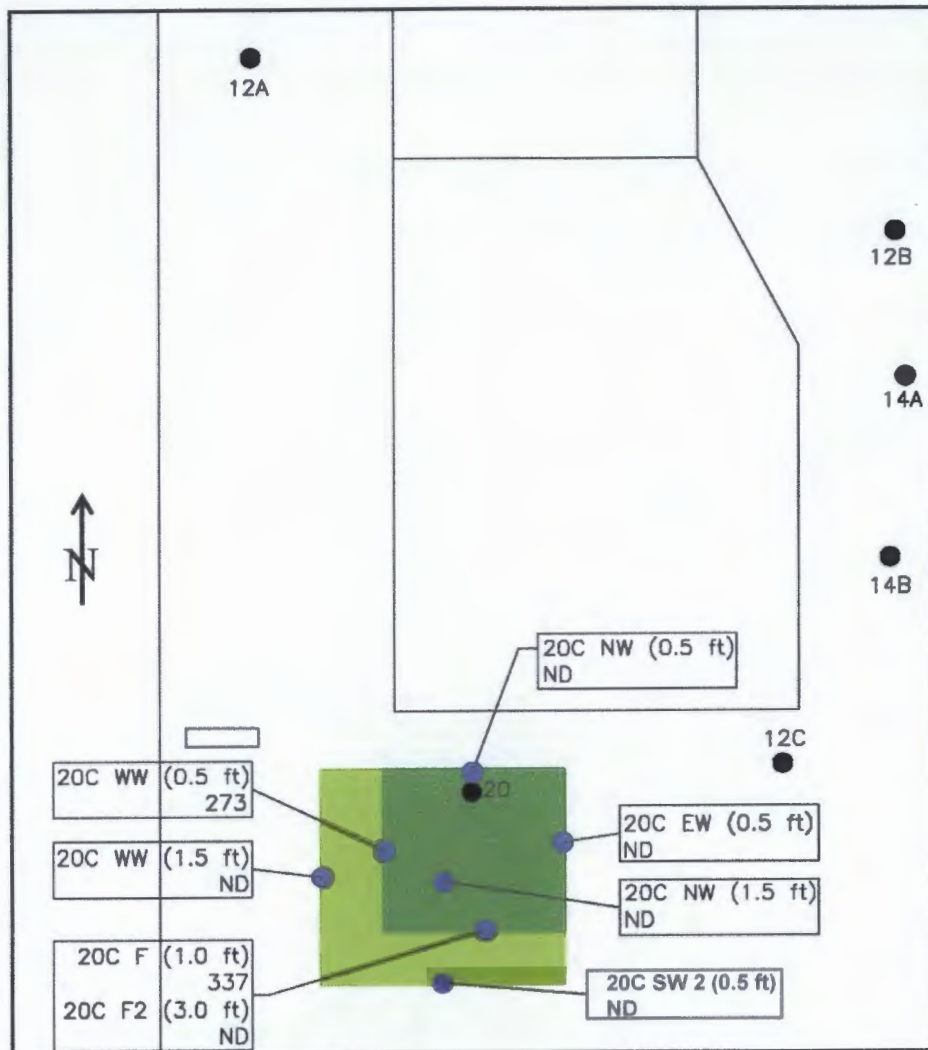
Slide 7

Soil Investigations

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





- **Aroclor 1260 at Concentrations in Excess of Commercial/Industrial CHHSLs.**
- **Two Rounds of Excavation and Confirmation Sampling.**
- **Final Set of Confirmation Samples Did Not Contain > Commercial/Industrial CHHSLs.**
- **Approximately 5 cubic Yards of Soil Excavated and Disposed of Off-Site.**

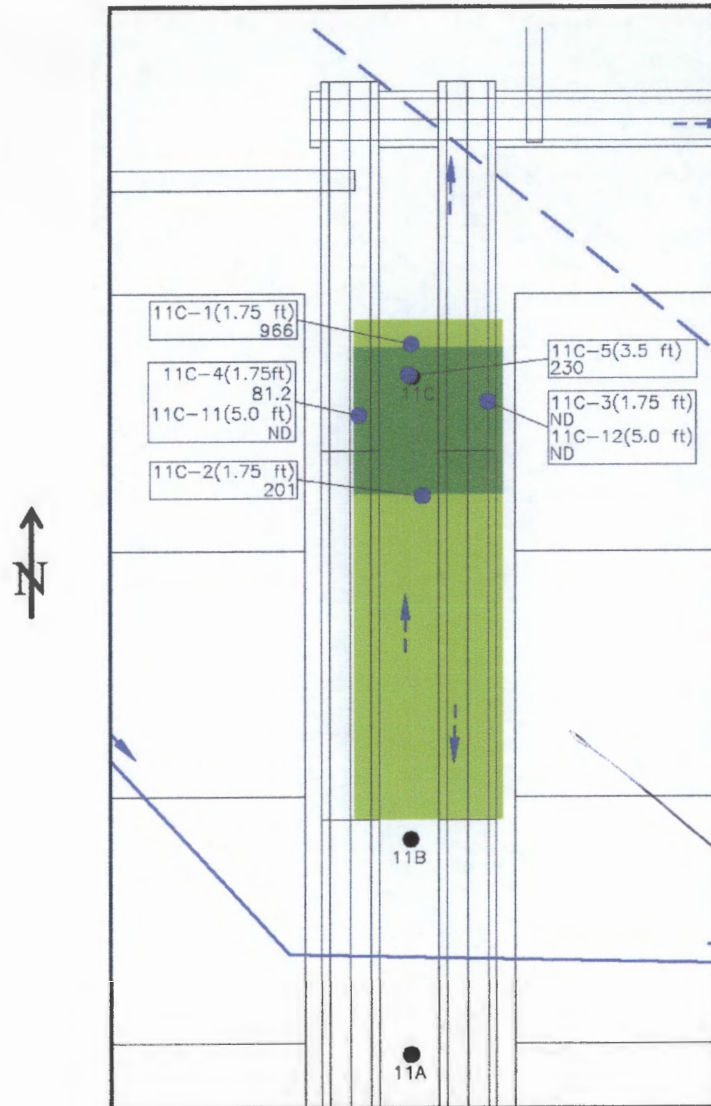
Slide 8

Area 20 Removal Action

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





Aroclor 1254

- ~~Aroclor 1260 at Concentrations in Excess of Commercial/Industrial CHSLs.~~
- ~~Two Rounds of Excavation and Confirmation Sampling.~~
- ~~Final Set of Confirmation Samples Did Not Contain > Commercial/Industrial CHSLs.~~
- ~~Approximately 5 cubic Yards of Soil Excavated and Disposed of Off-Site.~~

*beneath
free standing
wet peel bin.*

Slide 9

Area 11 Removal Action

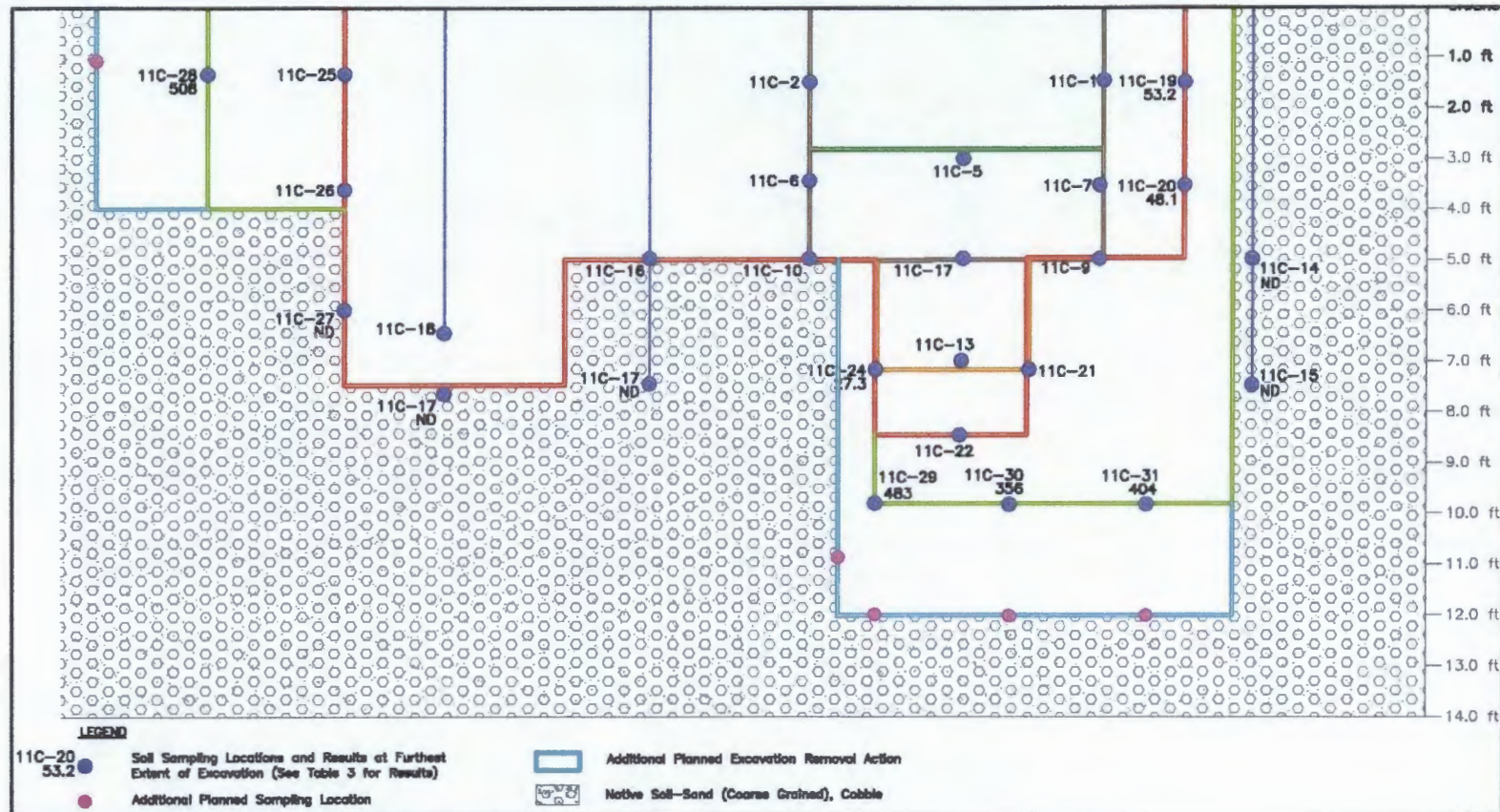
Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California



South

North



- Aroclor 1254 at Concentrations in Excess of Commercial/Industrial CHHSLs.
- Five Rounds of Excavation and Confirmation Sampling.
- Final Set of Confirmation Samples Contain > Commercial/Industrial CHHSLs – Additional Excavation Not Possible with Existing Structures.
- Approximately 15 cubic Yards of Soil Excavated and Disposed of Off-Site.
- Additional Excavation was Planned Following the Completion of Demolition Activities.

Slide 10

Area 11 Removal Action

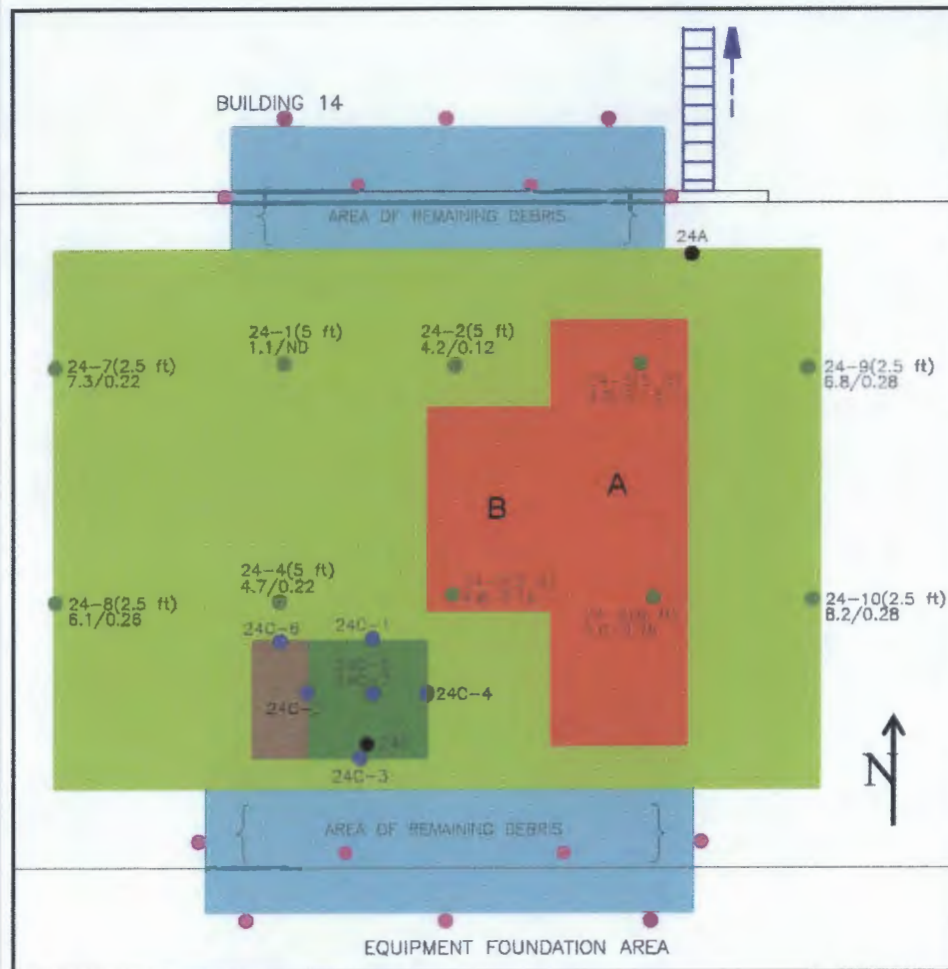
Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California

PCB soil \approx 15 cubic yards.

cross section of fig. in
slide 9.





- Debris in a Debris-Filled Concrete Bowl Structure Contained Total and Soluble Lead in excess of TTLC and STLC.
- Three Rounds of Excavation and Confirmation Sampling.
- Final Set of Confirmation Samples Contain Lead > California Waste Criteria – Additional Excavation Not Possible with Existing Structures.
- Approximately 100 Cubic Yards of Soil/Debris Excavated and Disposed of Off-Site.
- Additional Excavation was Planned Following the Completion of Demolition Activities.

Slide 11

Area 24 Removal Area

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





- **January 2010- Demolition Activities Begin.**
- **Asbestos and Lead Abated.**
- **Nineteen of Original Twenty-Three Buildings demolished as of Current Date.**
- **Environmental Monitoring Conducted of Subsurface During Demo.**
- **Areas of Concern (AOCs) Identified Based on Presence of Stained Soil, PID Readings or Odors.**
- **Samples Collected at Twenty-Four AOCs Analyzed for VOCs, PNAs, PCBs, pesticides, CAM Metals and TPHs.**
- **Additional Sampling Performed at Lifts (PCBs and TPH) Per City's Request.**
- **Results Compared to Conservative Screening Criteria (Commercial/Industrial CHHSLs).**

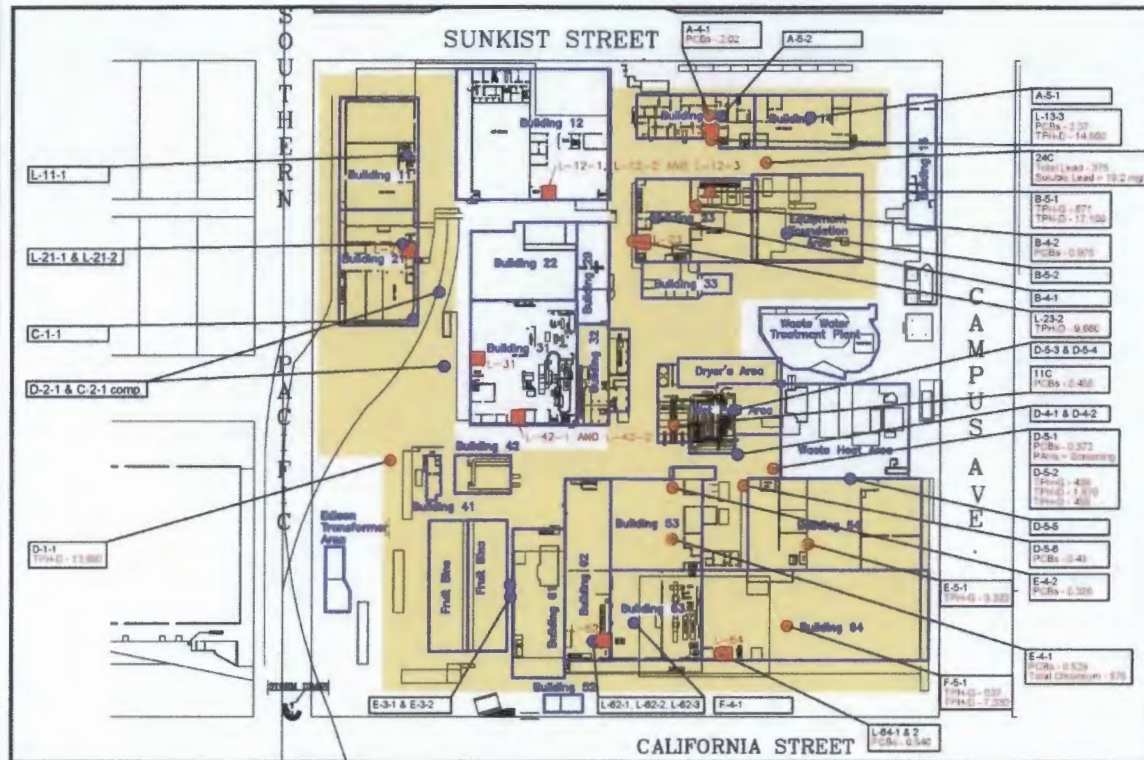
Slide 12

Area Of Concern Sampling During Demolition

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





• **Based on AOC and Lift Sampling Fourteen AOCs Contain Chemicals in Excess of Conservative Screening Criteria:**

- PCBs Only at Four AOCs and one Lift;
- Diesel-Range Hydrocarbons Only at Four AOCs and One Lift;
- Gasoline-Range Hydrocarbons at One AOC;
- PCBs and Diesel-Range Hydrocarbons at One Lift;
- PCBs and total chromium at One AOC; and
- PCBs and PAHs at one AOC.

• **One Removal Action Completed at L-64.**

*soil sampling
Anchor 1254*

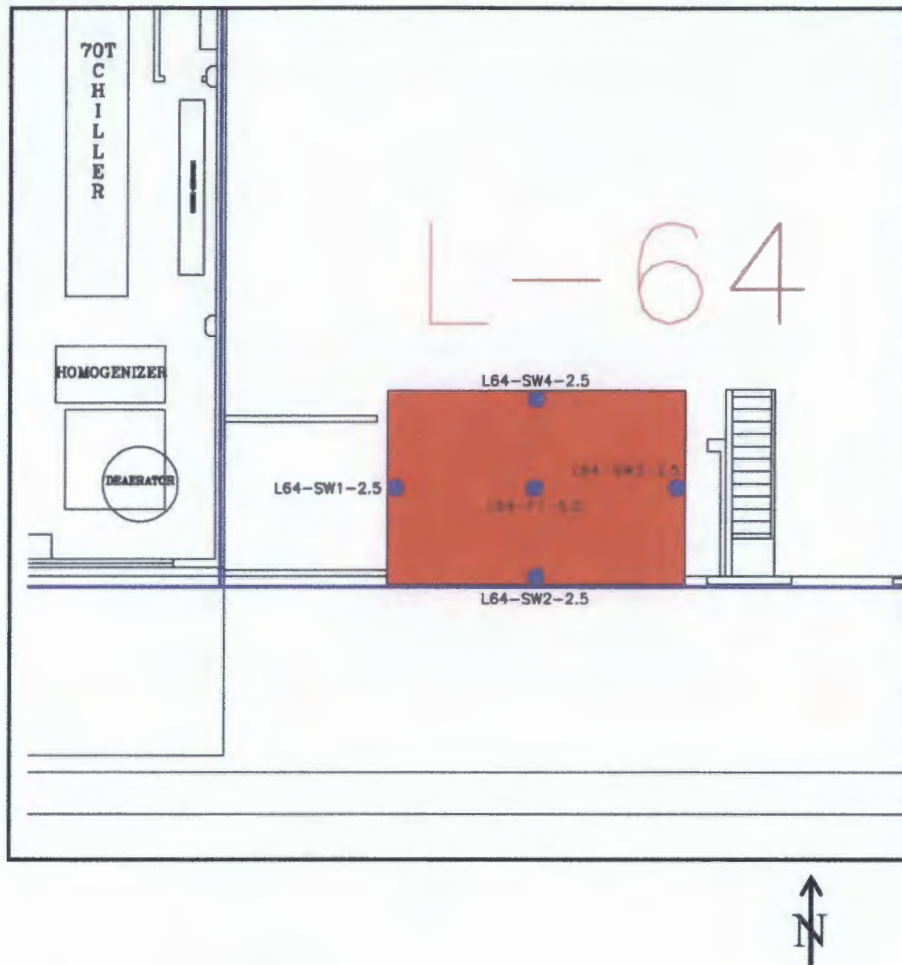
Slide 13

Results From AOC Sampling

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





Backfilling contains PCBs.

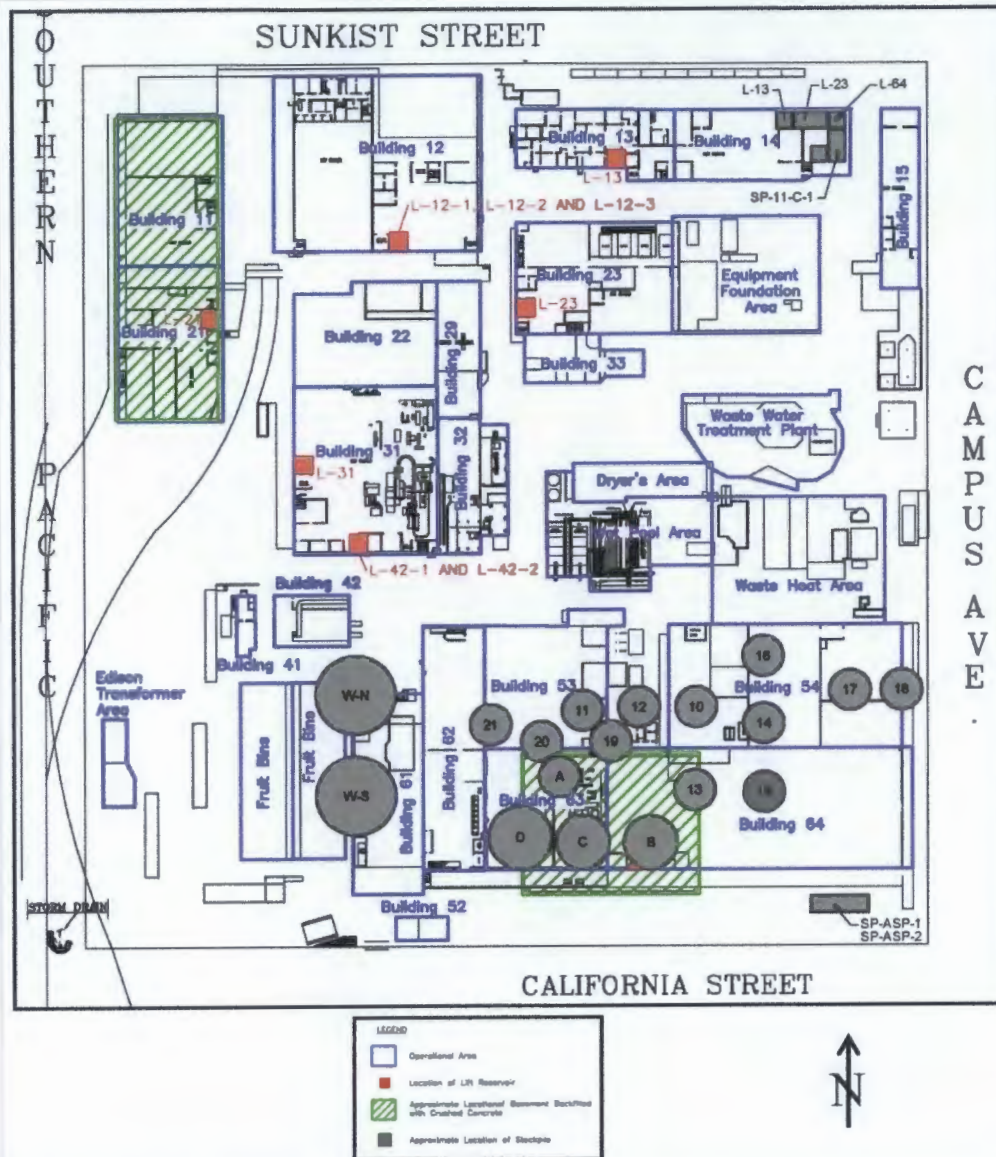
- Demolition Plan Approved by City of Ontario (Buyer) Included Backfilling of Basements (Buildings 64, 11, 21 and 12) with Crushed Concrete.
- L-64 is Located in the Basement of Former Building 64, and Initial Sampling Results Showed the Presence of PCBs at Greater than Conservative Screening Criteria – As a Result an Accelerated Removal Action was Performed at This Location.
- Post Soil Excavation Confirmation Soil Sampling Results Showed Very Low to Nondetectable Levels of PCBs.
- County of San Bernardino Oversaw Removal Action and Authorized Backfilling of This Location.

Slide 14

L-64 Removal Action

Former Sunkist Citrus Processing Plant
616 East Sunkist Street, Ontario, California





- **Material Was Initially Crushed and Placed Into Basements (Under Former Building 64, 11 and 21), Per City of Ontario Approved Plan.**
- **Samples Collected During the Initiation of Crushing Showed Variable Levels:**
 - Thirteen of the Twenty-three Noncrushed Samples Contained Detectable PCBs;
 - Three Samples > Conservative Screening Criteria;
 - Highest Detected Concentrations Was 1.11 milligrams per kilogram; and
 - Initial Crushed Sample Contained 0.122 mg/kg.
- **Placement Into Basements Continued Due to Space Constraints on Site.**
- **Sampling of the Crushed Concrete Continued at a Rte of Approximately One sample Per Every 500 Cubic Yards of Crushed Material.**
- **Following the Filling of Basements 11, 21, and 64, Eighteen Discrete Stockpiles were Created.**
- **Based on Sampling, PCBs in Crushed Material Ranges from Nondetect to 27.2 mg/kg.**

Slide 15

Stockpile Locations

Former Sunkist Citrus Processing Plant
616 East Sunkist Street, Ontario, California





- **Materials in Remaining Buildings (12, 15 and 32) Sampled per the Guidelines Specified in *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls* (Office of Environmental Measurement and Evaluation, EPA Region 1, October 21, 2008).**
- **Results Do Not Show Specific Material that Contained Concentrations High Enough to Account for the PCBs in Previously Crushed Material.**
- **One Sample Collected from A Concrete Joint at the Waste Water Treatment Plant Contained by Far the Highest Concentration of PCBs in Building Material (19.8 mg/kg).**
- **Demolition of Remaining Buildings is Continuing.**
- **Site Specific Human Health Risk Assessment Work Plan Submitted to OEHHA Through County/RWQCB.**
- **Following the Risk Assessment, Soil and Crushed Material that Does not Meet an Acceptable Risk Levels, Based on a Commercial/Industrial Use Standard Will be Removed.**
- **Removed Soil and Crushed Material Will be Appropriately Managed And Disposed of Off Site.**
- **All Removal Activities Must be Complete by October 1, 2011.**

Key to
complete sale of
the property.

Slide 16

Planned/Ongoing Additional Activities

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California





- **Known PCB Sources were Properly Managed and Disposed Off-Site by the End 1986.**
- **Releases of PCB Containing Material Between 1978 and 1986 are Not Documented and Should be Assumed to have Not Occurred, Given Sunkist's Proactive Steps to Address PCB Containing Material on the Site.**
- **No Pre-Demolition PCB Articles Were Identified that Contained >50 mg/kg of PCBs – Liquid (Oil and Water) From Lift Reservoirs Did Not Contain >50 mg/kg of PCBs.**
- **Testing Results From Samples Collected from Porous and Painted Surfaces at Buildings 12, 15, 32, and the Wastewater Treatment Plant Did Not Contain >50 mg/kg of PCBs (Concrete Caulking Contained the Highest Concentration at 19.8 mg/kg).**
- **The Data Support the Conclusion that the Following Two Potential Sources Contributed to the PCB Presence in Soil and Crushed Concrete at the Site:**
 1. Concrete Caulking; and
 2. PCB Containing Fluid Released Prior to April 18, 1978.
- **"As Found" Concentrations (Soil, Crushed Concrete, Building Materials) Did Not exceed 50 mg/kg. As a Result, the Conditions Observed Do Not Represent an Unreasonable Risk. Following the Preparation of A Site-Specific Risk Assessment, Soil and Crushed Concrete that Does Not Meet an Acceptable Level of Risk, Based on a Commercial/Industrial Use Standard, Will be Properly Managed And Disposed of Off-Site.**
- **Based on These Factors the TSCA Requirements DO Not Appear to Apply to This Site.**

Slide 17

TSCA Applicability

Former Sunkist Citrus Processing Plant

616 East Sunkist Street, Ontario, California



TABLE 1
PCBs in Building Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Location Description | | | | | | | | |
|--|-------------|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--|
| | | | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | |
| Building 31 | | | | | | | | | | |
| B31-A | 10/28/2010 | Stained Concrete in Caged Area in Northwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.211 | <0.025 | |
| B31-B | 10/28/2010 | Stained Concrete Outside Caged Area in Northwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.125 | 1.43 | |
| B31-C | 10/28/2010 | Stained Concrete Outside Caged Area in Northwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0712 | 0.511 | |
| B31-D | 10/28/2010 | Grout Between Two Concrete Slabs in Northwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.155 | 0.221 | |
| B31-E | 10/28/2010 | Stained Concrete Behind Transformer in Northwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | 0.0479 | |
| B31-F | 10/28/2010 | Stained Concrete Wall Behind Machine Near Center of North Wall | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.259 | 0.0609 | |
| B31-G-1 | 10/28/2010 | Top Of Equipment Foundation on East Side of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.419 | <0.025 | |
| B31-G-2 | 10/28/2010 | Stained Concrete near Floor of Equipment Foundation on East Side of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.145 | 0.142 | |
| B31-H | 10/28/2010 | Stained Concrete on Eastern Wall | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0258 | <0.025 | |
| B31-I | 10/28/2010 | Stained Concrete in Caged Area in Southeast Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.268 | 0.165 | |
| B31-J-1 | 10/28/2010 | Concrete South Wall | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | |
| B31-J-2 | 10/28/2010 | Grout South Wall | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | |
| B31-K | 10/28/2010 | Stained Concrete in Southwest Area of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.116 | 0.127 | |
| B31-L | 10/28/2010 | Stained Concrete Next to Transformers, Northwest Area - 1st Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.15 | <0.025 | |
| B31-M | 10/28/2010 | White Wall Above B31-L, Northwest Area - 1st Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.111 | <0.025 | |
| B31-N | 10/28/2010 | Stained Concrete Enclosed Area, Middle Part of 1st Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.07 | 0.157 | |
| B31-O | 10/28/2010 | Stained Concrete near Small Elevator, South Side of 1st Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0513 | <0.025 | |
| B31-P | 10/28/2010 | Stained Concrete Next to Drain and 1.0 foot Wall, Southeast Corner - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.329 | <0.025 | |
| B31-Q | 10/28/2010 | Red Paint on East Side Floor - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.288 | <0.025 | |
| B31-R | 10/28/2010 | Stained Concrete Next to Electric Switches along South Wall - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.417 | <0.025 | |
| B31-S | 10/28/2010 | Stained Concrete Next to Electric Switches in Northwest Corner - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.18 | <0.025 | |
| B31-T | 10/28/2010 | Grout Under Electric Switches on Central Part of North Wall - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.121 | <0.025 | |
| B31-U | 10/28/2010 | Stained Concrete in Caged Area in Northeast Area - 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 3.80 | <0.025 | |
| B31-V | 10/28/2010 | Stained Concrete at Low Spot Near Drain, South Side - 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.463 | <0.025 | |
| B31-W | 10/28/2010 | Stained Concrete Near Electric Switches/Transformer, Northwest Side - 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.941 | <0.025 | |
| B31-X | 10/28/2010 | Stained Concrete Near Electric Switches, Northeast Side - 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.511 | <0.025 | |
| B31-Y | 10/28/2010 | Stained Roofing on Eastside of Roof | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | |
| | | | | | | | | | | |
| Building 54 | | | | | | | | | | |
| B-54-A | 10/29/2010 | Brown, Lightweight, Foam-Like Material Found Under Foundation | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | |
| | | | | | | | | | | |
| Waste Water Treatment Plant | | | | | | | | | | |
| WW-A | 10/20/2010 | Black Grout Between Waste Water Treatment Concrete Slabs | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | 19.89 | |
| | | | | | | | | | | |
| Screening Criteria | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | |
| Regional Screening Levels - Industrial | | | 21 | 0.54 | 0.54 | 0.74 | 0.74 | 0.74 | 0.74 | |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

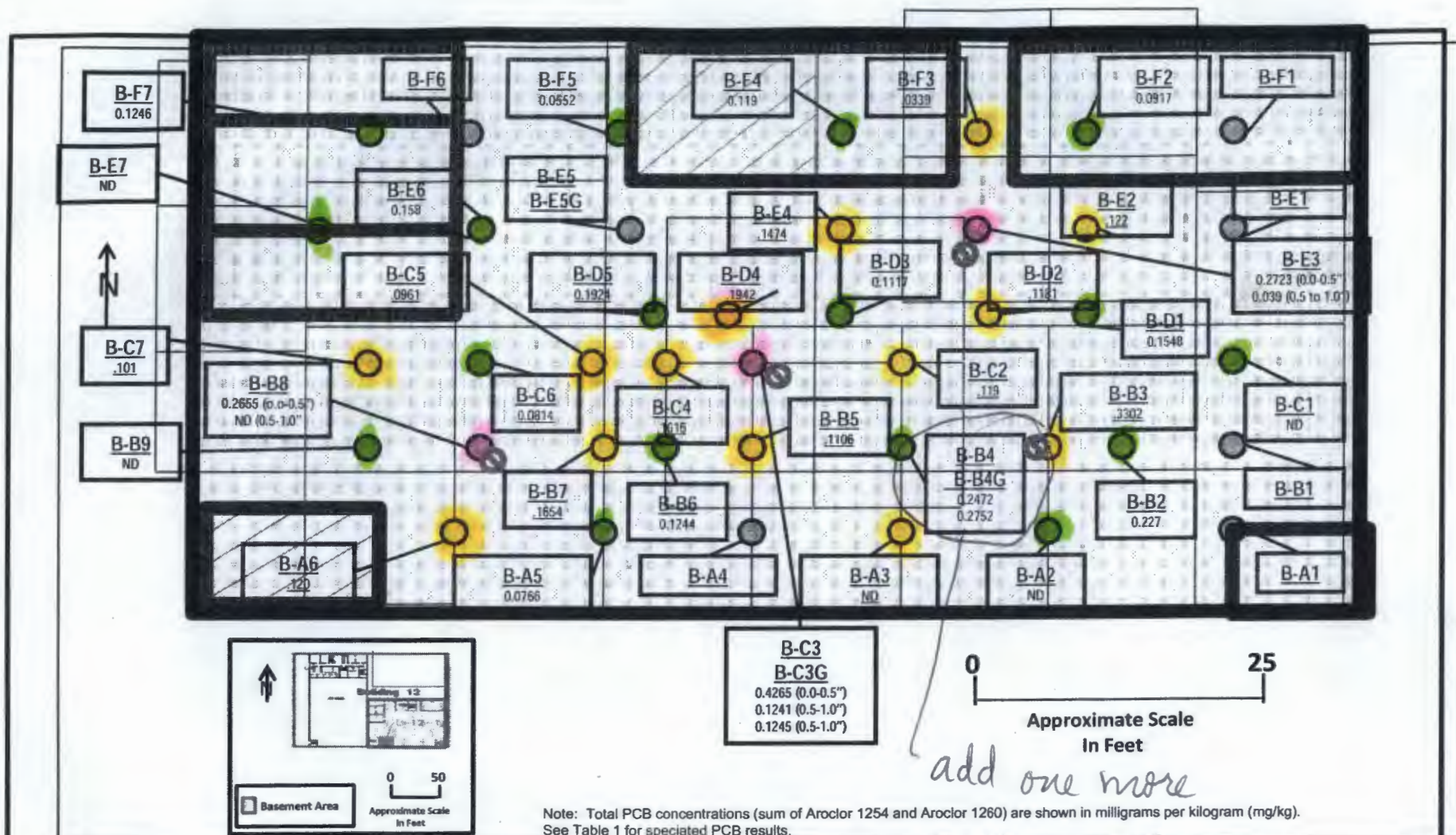
Bold = Values > Screening Criteria.

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 1
PCBs in Building Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Location Description | | | | | | | |
|-----------------------|-------------|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| | | | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 |
| Building 15 | | | | | | | | | |
| B15-A-1A | 10/20/2010 | Floor Concrete Interior (No Paint) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-A-1B | 10/20/2010 | Floor Concrete Surface (With Red Paint) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-A-2 | 10/20/2010 | Wall Cover (Fiberglass) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-A-3A | 10/20/2010 | Block Wall Interior (No Paint) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-A-3B | 10/20/2010 | Block Wall Surface (With Yellow Paint) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.284 | <0.025 |
| B15-A-4 | 10/20/2010 | Grout Between Block on Wall | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-A-5 | 10/20/2010 | Ceiling (Wood Behind Fiberglass) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-D | 10/20/2010 | Oil Stained Floor (Near Drain) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.672 | 0.0902 |
| B15-E | 10/20/2010 | Foam Around Piping | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-F | 10/20/2010 | Foam Between Wall and Steel Beam | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-G | 10/20/2010 | Grout Between Brick and Concrete (Outside B-15) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-H | 10/20/2010 | Block Wall Surface on Roof (With Blue Paint) | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-I-A | 10/20/2010 | Black Tar Substance On Roof | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-I-B | 10/20/2010 | Cardboard On Roof | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-I-C | 10/20/2010 | Plywood On Roof | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B15-J | 10/20/2010 | Grout Between Concrete Slabs - Outside of B-15 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.374 | 0.0392 |
| B15-K | 10/20/2010 | Grout Around Window - Outside of B-15 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| | | | | | | | | | |
| Building 12 | | | | | | | | | |
| B12-A | 10/27/2010 | Stained Concrete Under Gain Control - Southwest Corner of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.204 | 0.0615 |
| B12-B | 10/27/2010 | Grout Between Cement Slabs - Middle of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.340 | 0.0865 |
| B12-C | 10/27/2010 | Stained Concrete By Lighting Transformer - Northeast Corner of Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.182 | 0.0903 |
| B12-D | 10/27/2010 | Grout Between Floor and Wall - Ground-Level Floor, Northwest Side | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-E-1 | 10/27/2010 | Wall Brick - Ground-Level Floor, Northwest Side | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-E-2 | 10/27/2010 | Grout Between Wall Bricks - Ground-Level Floor, Northwest Side | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-F | 10/27/2010 | Wall Tile in Bathroom - Ground-Level Floor, Southeast Side | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-G | 10/27/2010 | Grout From Floor - Ground-Level Floor, Northwestern Room | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-H-1 | 10/27/2010 | Cement Under Concrete Floor - Ground-Level Floor, Northwestern Room | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-H-2 | 10/27/2010 | Concrete Floor Over Cement - Ground-Level Floor, Northwestern Room | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-I | 10/27/2010 | Cement Slab near Northeast Wall - Ground-Level Floor, Northwestern Room | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-J | 10/27/2010 | Stucco From Wall Near Elevator - Former Lobby Area | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-K | 10/27/2010 | Stained Concrete Under Hydraulic Tank Under Stairway - Former Lobby Area | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.068 | <0.025 |
| B12-L | 10/27/2010 | Stained Concrete in Front of Garage Door - Northeast Side of 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0448 | <0.025 |
| B12-M | 10/27/2010 | Glue Beneath Former Carpet - Northwest Side of 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.102 | <0.025 |
| B12-N | 10/27/2010 | Grout From Between Brick Wall and Ceiling - Northwest Side of 2nd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-O | 10/27/2010 | Stained Concrete in Front of South Elevator - Southwest Side on 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.477 | <0.025 |
| B12-P | 10/27/2010 | Stained Concrete Near Gated Transformer Area - Southwest Side on 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-Q | 10/27/2010 | Concrete Floor - Walkway between Building 12 and 31 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.194 | <0.025 |
| B12-R | 10/27/2010 | Stained Concrete in Transformer Cage - Main Room on 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-S | 10/27/2010 | Fiberglass Insulation on Ceiling - Main Room on 3rd Floor | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-T | 10/27/2010 | White Material on Roof | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B12-U | 10/27/2010 | Stained Concrete on 1st Floor - Near Stairway to Basement | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 4.90 | <0.025 |
| B12-V | 11/3/2010 | Stained Material on Roof of Small Building (Southeast Side of B12), Near B12-U | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.944 | <0.025 |



Legend

- Collected/Analyzed Concrete Samples at 0.0 to 0.5 inches
- Collected/Analyzed Concrete Samples at 1.0 to 1.5 inches
- Additional Collected/Analyzed Concrete Samples at 0.0 to 0.5 inches
- Collected Concrete Samples - Hold, No Analyses
- Recommended Soil Sampling - 0.5 and 5.0 feet
- Elevator Shaft Location - Concrete Previously Removed

BEC
17011 Beach Blvd., Suite 900
Huntington Beach, CA. 92647
Tel. (877) 232-4620
Fax (714)840-4963

Concrete/Soil Sampling
at Building 12
Sunkist Grower, Inc.
Ontario, California

Figure
No. 1

RE: Soil Sampling Beneath Building 12 Basement Floor, Congener Analysis, and Revised Risk Assessment

Brett Bowyer

to:

Carmen Santos

02/15/2011 02:08 PM

Cc:

"Rudd, Keith"

Show Details

Hello Carmen,

Please see the attached results from the additional concrete testing from the Building 12 Basement floor. As shown on the attached figure, the results are similar to the previous results in that relatively low levels of Aroclor 1254 and 1260 were observed. Of the 14 additional samples analyzed, one did not have detectable concentrations of PCBs. Aroclor 1254 was detected in 12 of the tested samples at between 0.0282 and 0.122 milligrams per kilogram (mg/kg). The average Aroclor 1254 concentration from the detected samples was 0.05 mg/kg. Aroclor 1260 was detected in 11 of the tested samples at between 0.0339 and 0.302 mg/kg. The average Aroclor 1260 concentration from the detected samples was 0.111 mg/kg. Based on these and the initial 22 samples, none of the 36 concrete samples analyzed contained concentrations in excess of the Regional IX Regional Screening Levels (RSLs) for industrial land use sites.

The attached figure also shows the proposed soil sampling locations. As shown, we've selected four locations for soil sampling at the locations that exhibited the highest PCB concentrations. At each of these locations, the concrete will be removed and soil samples will be collected at 0.5 and 5.0 feet. Each of these soil samples (8 total) will be analyzed for PCBs by EPA Method 8082.

Please let me know if you have any questions regarding the proposed soil sampling locations, and if not, please let me know that you concur with our recommendations. As we've discussed, Sunkist would like to proceed with this effort as quickly as possible so that Basement 12 can be backfilled. As such, we would like to collect the soil samples on Thursday this week.

Also, we are still waiting for your approval of our proposed plan to conduct testing of select soil samples for congeners, and comments and/or approval regarding the revised risk assessment workplan. The implementation of these efforts is critical to our overall schedule on this project. Please contact me if you have any questions regarding these issues, or anything else with respect to the project.

Thank you.

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Monday, February 07, 2011 4:53 PM

To: Brett Bowyer

Subject: Re: FW: Building 12 Basement Floor Sampling

Hello Brett:

Thank you very much for the message and all the sample analysis information. I very much appreciate it. This week is pretty hectic for me and still would like to touch basis with you concerning the information you sent. Please let me know when you expect the analysis results for the archived samples. The next step, that is, soil sampling looks good.

I thank you for your courtesies and look forward to your reply.

Regards,
Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
voice: 415.972.3360
facsimile: 415.947.3533
"Earth laughs in flowers." R. W. Emerson

From: "Brett Bowyer" <brettbowyer@bowyerenvironmental.com>
To: Carmen Santos/R9/USEPA/US@EPA
Date: 02/07/2011 02:54 PM
Subject: FW: Building 12 Basement Floor Sampling

Hello Carmen,

The sampling of the concrete in the basement of Building 12 was performed as per the approved email sampling plans that were submitted on January 20, and January 21, 2011. As noted on your January 24, 2011 email it was also confirmed that surrogate samples would be prepared and run by the laboratory.

All of the results are summarized on Table 1. In total 43 samples were collected from 41 location (two duplicate samples were collected). A total of 22 samples were analyzed for PCBs by EPA Method 8082 (including the two duplicate samples). The sampling locations are shown on Figure 1.

Of the 22 samples analyzed, 5 did not have detectable concentrations of PCBs. Aroclor 1254 was detected in 15 of the tested samples at between 0.0256 and 0.119 milligrams per kilogram (mg/kg). The average Aroclor 1254 concentration from the detected samples was 0.052 mg/kg. Aroclor 1260 was detected in 12 of the tested samples at between 0.0385 and 0.24 mg/kg. The average Aroclor 1260 concentration from the detected samples was 0.119 mg/kg.

In total, 17 samples had a detectable concentration of PCBs. The lowest detected total PCB (sum of aroclor 1254 and Aroclor 1260) concentration was 0.039 mg/kg, and the highest was 0.2752 mg/kg. The average total PCB concentration observed in the 17 samples was 0.137 mg/kg. The results of the total PCB concentrations are shown on Figure 1.

Based on these results, it appears that low levels of Aroclor 1254 and Aroclor 1260 are present throughout most of the

basement floor. None of the detected concentrations exceeded Regional IX Regional Screening Levels (RSLs) for industrial land use sites.

The three locations (B-E3, B-C3 and B-B8) that were sampled at deeper (0.5 to 1.0 inches) depths contained lower concentrations than the earlier samples that were collected at 0.0 to 0.5 inches (B12-C, B12-B and B12-A, respectively).

This information confirms that PCB concentrations do not increase with depth.

In order to confirm that lateral concentrations do not increase to levels above those observed. It is recommended that 14 of the samples that were collected and put are hold are analyzed for PCBs. The samples to be analyzed are shown in yellow on Figure 1.

Based on the results of these additional analyses, locations will be selected for sub-basement floor soil sampling. These locations will be selected based on the highest observed PCBs in the basement concrete. The soil sampling will be performed to confirm that elevated levels of PCBs are not present in the soil beneath Basement 12.

Please let me know if you have any questions regarding the proposed additional analyses, and if not, please let me know that you concur with our recommendations. As we've discussed, Sunkist would like to proceed with this effort as quickly as possible so that Basement 12 can be backfilled.

Thank you.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Office: (877) BEC-INC-0
(877) 232-4620
Cell: (714) 878-7191
FAX: (714) 840-4963

brettbowyer@bowyerenvironmental.com
www.bowyerenvironmental.com

This message contains information that may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete this message completely from your computer system. Thank you.

[attachment "Fig.1_012711_B-12 Sampling.pdf" deleted by Carmen Santos/R9/USEPA/US] [attachment "020711_Building Materials.pdf" deleted by Carmen Santos/R9/USEPA/US] [attachment "B11A036report.pdf" deleted by Carmen Santos/R9/USEPA/US]

11-19-10



November 17, 2010

VIA FEDERAL EXPRESS

Ms. Arlene Kabei
Associate Director
Waste Management Division
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Data Summary and TSCA Applicability Evaluation
Former Sunkist Citrus Processing Plant - County Site No. 2009004
616 E. Sunkist Street
Ontario, California

Dear Ms Kabei:

Bowyer Environmental Consulting, Inc. (BEC) represents Sunkist Growers Inc. (Sunkist). We are providing this data summary to the USEPA Region 9 Waste Management Division (EPA Region 9) in order to seek concurrence with respect to the lack of applicability of Toxic Substances Control Act (TSCA) requirements to the remediation waste and concrete present at the former Sunkist Citrus Processing Plant (Site). The Site is located at 616 E. Sunkist Street in Ontario, California as shown on Figure 1.

In preparing the Site for an anticipated sale to the City of Ontario (City), Sunkist has been conducting subsurface investigations and remedial actions at the Site. In addition, existing structures are in the process of being demolished. Sunkist has entered into a Voluntary Cleanup Program with the San Bernardino County Hazardous Management Division (HMD) in association with these investigation and cleanup activities. In addition, Sunkist is currently preparing to enter into a cost recovery agreement with the Santa Ana Regional Water Quality Control Board (RWQCB). The RWQCB will serve as the contracting agent to allow for the Office of Environmental Health Hazard Assessment (OEHHA) to review a risk assessment that will be prepared for the Site.

BACKGROUND

The approximately 11.11-acre Site is located in the City of Ontario, approximately 1 mile west of the Ontario International Airport, and between the San Bernardino Freeway (Highway 10) to the north, and the Pomona Freeway (Highway 60) to the south.

General Geology and HydroGeology

The Site is located within the Pomona/Chino Valley, which is bordered on the north by the San Gabriel Mountains, on the east by the San Jacinto Fault, on the south by the Santa Ana Mountains, and on the west by the San Jose/Puente/Chino Hills. The area near the Site is reportedly underlain by young alluvial fan deposits of fine-to-coarse-grained sedimentary units formed by the San Antonio Creek and its tributaries (California Department of Conservation, Division of Mines and Geology, 2000).

A significant groundwater investigation is being conducted to the west of the Site in association with the former General Electric Company Flatiron facility (234 East Main Street, Ontario, California). Based on the 3rd Quarter 2008 Groundwater Monitoring Report (AMEC, Geomatrix, Inc., November 24, 2008), the depth to groundwater within the general vicinity of the Site is between 265 and 369 feet beneath ground surface (bgs). Groundwater reportedly flows towards the south within the general vicinity of the Site.

History of Site Operations

According to the *Historic Context for the City of Ontario's Citrus Industry* (City of Ontario Planning Department, February, 2007), the Site was developed as a citrus by-products plant in 1926 by the Ontario Citrus Exchange (a predecessor to Sunkist). As of early 2010, the site consisted of 23 buildings, a waste water treatment plant, a Dryers Area, a Waste/Heat area, a Wet Peel Area, and a fenced in Edison Transformer. These operational features are shown on Figure 2. The two large fruit bins shown in the southwestern area of the Site (Figure 2) were removed several years ago, and were no longer present at the Site as of the initiation of demolition activities.

For the most part Sunkist terminated citrus processing at the Site in 2008. The waste water treatment plant continues to operate at the Site to accommodate the ongoing bulk storage operation that Partners Alliance operates at 617 E. Sunkist Street (directly north of the Site). Partners Alliance is in the process of rerouting waste water to the Inland Empire Utilities Agency (IEUA) system and will no longer need to utilize the waste water treatment system.

Future Planned Property Use

The City is interested in acquiring the Site in association with a new commercial and/or industrial development. It is our understanding that the City plans to hold the property for a period of time pending future development. Possible future development plans include the development of a new multi-tenant industrial park.

Previous Environmental Investigations

On behalf of the City, Leighton Consulting, Inc. (Leighton) conducted a Limited Phase II Environmental Site Assessment (Phase II Investigation) at the Site in October 2008. In addition, BEC conducted a data gap investigation in August 2009. Based on these investigations, two areas of shallow soil (Area 11C and Area 20) were found to contain polychlorinated biphenyls (PCBs) at concentrations in excess of conservative screening criteria (CSC) for commercial/industrial property use.¹ One additional area of shallow soil and debris (Area 24C) was found to contain total and soluble lead in excess of CSCs. CSCs utilized in this evaluation included the Commercial/Industrial California Human Health Screening Levels (CHHSLs), Industrial Region IX Preliminary Remediation Goals (PRGs), and state and federal hazardous waste criteria.

As summarized in BEC's July 31, 2009 Interim Report - Soil Removal and Confirmation Sampling Report (Interim Report), an initial soil removal activity was implemented to address these areas. During these activities, soil was excavated at Area 20 and confirmation samples were collected which demonstrated that all soil in excess of CSC had been removed from this area. Due to the presence of existing structures, further excavations and soil removal activities in two areas (11C and 24C) were deferred until the overlying structures had been removed.

A Removal Action Workplan, associated with additional remedial and environmental activities to be conducted during the demolition of subsurface structures was prepared (BEC, June 4, 2010). The HMD approved the Removal Action Workplan on June 16, 2010.

¹ Subsequent to the data collection described in this letter, Sunkist determined that several small transformers were historically present at the Site, and that between 1984 and 1986 these transformers were formerly decommissioned and removed by a 3rd party consultant.

SUMMARY OF SITE DEMOLITION ACTIVITIES

Demolition activities began at the Site in early 2010. These activities have included the removal of most of the 23 former structures. As of the current date, the only buildings that remain on the Site are buildings No. 15, 12, 31, and the floor of Building 22. The previous and currently existing building locations are shown on Figure 2.

Prior to demolition, asbestos and lead abatement activities were implemented and completed. These abatement activities were conducted as per the requirements of the South Coast Air Quality Management District (SCAQMD). In addition, environmental monitoring activities have been conducted per the HMD-approved Removal Action Workplan. These activities are described in the following subsections.

Environmental Monitoring During Demolition

BEC personnel have conducted environmental monitoring to evaluate soil conditions during the removal of foundation, asphalt, roadways and other surface and sub-grade structural features. The environmental monitoring has consisted of a three-tiered process, including:

- Visual monitoring of all exposed soil for obvious staining or other visual impact;
- Olfactory monitoring of all exposed soil for noticeable odors; and
- Field screening with a flame ionization and photoionization detector (FID/PID) in order to document soil that exhibits elevated readings of VOCs.

Locations that exhibited one or more of the three monitoring criteria were deemed to be Areas of Concern (AOCs). Soil samples were collected from each of these areas and analyzed for the following parameters:

- California Administration Manual (CAM) metals by USEPA Method 6000 and 7000 Series;
- Hexavalent chromium by USEPA Method 7096A;
- Total petroleum hydrocarbons (TPH) in the gasoline, diesel and oil ranges by USEPA Method 8015M;
- Polyaromatic hydrocarbons (PAHs) by USEPA Method 8270C SIM;
- Semi-volatile organic compounds (SVOCs) by USEPA Method 8270C;
- PCBs by USEPA Method 8082;
- Pesticides by USEPA Method 8081A; and

- Volatile organic compounds (VOCs) by USEPA Method 8260B.

In addition, at each former lift location, two soil samples were collected and analyzed for TPH and PCBs even when an AOC was not identified during the environmental monitoring process.

A total of twenty-four AOCs have been observed based on field monitoring (staining, odor and/or photoionization detector readings) as of October 30 2010. Samples have also been collected from beneath six lifts during this time period. Three additional samples were collected from stockpiled asphalt and soil that was generated during the surface removal process. The locations of the AOCs are shown on Figure 3. The location of the stockpiles is shown on Figure 4. The AOC results are summarized on Table 1 and the results from samples collected from soil and asphalt stockpiles are summarized on Table 2. Specific results from analysis conducted on samples collected at AOCs, lifts, and stockpiled soil/asphalt are summarized on Tables 3 through 9.

Based on the results, soil samples collected from sixteen of the thirty AOC and lift sampling locations did not contain concentrations in excess of CSCs. Of the other fourteen AOC and lift soil sampling locations the following compounds were observed at concentrations in excess of CSC:

- PCBs – four AOCs and one lift;
- Diesel-range hydrocarbons – Four AOCs and one lift;
- Gasoline-range hydrocarbons – One AOC;
- PCBs and diesel-range hydrocarbons – One lift;
- PCBs and total chromium – One AOC; and
- PCBs and PAHs – One AOC.

Initial Removal Action – Lift 64

Two large stockpiles of partially processed concrete were created during the initial phases of the Site demolition process. In addition, basement structures, of various depths, were present beneath Buildings 11, 21 and 64. In order to help balance the future Site grade conditions (grading to be performed in the future by the City at a later date), it was decided that the concrete would be crushed and placed within the basements. Based on the sampling performed beneath the former lifts as part of the environmental monitoring during grading, the presence of PCBs in excess of CSC was observed in soil beneath former Lift 64. In order to allow the crushed concrete to be

placed within Basement 64, an early removal action was implemented at this location. This removal action was conducted on September 20, 2010.

The removal action consisted of excavating soil to depths of 5.0 feet from beneath the former lift. It should be noted that the bottom of the lift was recessed approximately 5.0 feet beneath the floor of the basement. As the basement for Building 64 was approximately 12 feet bgs, the 5.0 foot excavation beneath Lift 64 took place at depths of 17 to 22 feet bgs. An area of approximately 140 feet (14 by 10 feet) was excavated from beneath former lift 64 as shown on Figure 5.

This excavation generated approximately 25 cubic yards of soil. The soil has been stockpiled with other excavate material as shown on Figure 4.

Following the excavation, four sidewall samples were collected from the approximately midpoint of the excavation on the north, south, east and west walls. In addition, one floor sample was collected from the bottom of the excavation. Per the Removal Action Workplan, the confirmation samples were to be analyzed for compounds that were observed to be in excess of CSC based on sampling performed during the environmental monitoring task. As PCBs were the only compound observed at this AOC in excess of CSC, each of the five confirmation samples were analyzed for PCBs.

The results of these analyses are shown on Table 10. As shown, none of the confirmation samples contained detectable levels of PCBs.

These results were provided to the HMD and a Site inspection was conducted on September 29, 2010. Based on the results obtained, the HMD verbally concurred with the conclusion that no further work was required in association with former Lift 64, and the excavation could be backfilled. A copy of the email correspondence that documents the HMD's verbal approval is attached.

Demolished Concrete

Concrete, brick and other materials generated during the demolition process was initially stockpiled into two large, partially processed stockpiles. On September 3, 2010, the crushing of this concrete commenced. As previously described, given space constraint at the site, the initially crushed concrete was placed directly into three basement structures that underlay the former Buildings 11, 21 and 64. Upon the initiation of crushing operations (September 3, 2010), twenty-three samples of this partially processed material and one sample of the initial crushed material was collected. Each of these twenty-four samples was analyzed for PCBs and TPH, given that these were the compounds that were most frequently observed in subsurface soil

samples collected at the AOCs and lifts. In addition, four partially processed and one of the initial crushed samples were also analyzed for VOCs, PAHs, pesticides and total metals. Results of these analyses did not detect the presence of VOCs or pesticides. In addition, relatively low levels of metals, PAHs and TPH were observed. PCBs were observed in several of the partially processed samples and within the crushed sample. However, the average concentration observed in the partially processed material, and the concentration observed in the initial crushed sample were lower than CSC.

Based on these results, and the logistical problems posed by the space constraints on the Site, it was decided to continue to crush and place the concrete within the existing basement structures. Following the filling of the basements, enough space would be created to allow the remaining crushed material to be stockpiled at the Site. Samples of the crushed concrete were collected at a rate of approximately one sample per every 500 cubic yards of material generated. Each of these samples has been analyzed for PCBs, given that this was the only compound observed in the initial samples that exhibited a discrete sample concentration in excess of CSC.

Tables 11, 12, 13 and 14 summarize the concrete sample results for PCBs, TPH, metals, PAHs, respectively. Tables associated with VOCs and pesticides were not prepared as these compounds were not detected during the initial sampling of partially processed and crushed concrete. As shown on Table 11, the PCB concentrations detected in the crushed concrete have ranged from non detect to 27.2 milligrams per kilogram (mg/ kg).

Sampling of Pre-Excavation Asphalt

In order to evaluate the remaining in-place asphalt for incorporation into the concrete crushing effort, ten samples were collected from this material from various locations across the Site on October 5, 2010. As described under the description of environmental monitoring during demolition section of this summary, excavated asphalt had been tested for PCBs, VOCs, PAHs, TPH, total metals and pesticides. The results obtained from these samples (SP-ASP-1 and SP-ASP-2) are summarized on Tables 3, 4, 5, 6, 7, and 8. The results of these analyses showed that only PCBs were present at concentrations in excess of CSC in the stockpiled asphalt. Lead was present at concentrations of greater than ten times the Soluble Threshold Limit Concentration (STLC). As a result, both samples were analyzed by the Waste Extraction Test, and the concentration of the leachate was found to be less than the STLC. The Waste Extraction Test results are shown on Table 9.

Based on these results, each of the ten samples collected from the pre-excavated asphalt were analyzed for PCBs. Results obtained from these analyses are summarized on

Table 15. As shown, PCBs were observed in only one sample at concentrations in excess of CSC. Based on these results, and the more elevated PCB results obtained on the crushed concrete (see previous section), it was determined that removing the remaining asphalt and incorporating it into the on-going concrete crushing program was not likely to increase PCB concentrations within the crushed material.


CONCLUSION WITH RESPECT TO TSCA APPLICABILITY

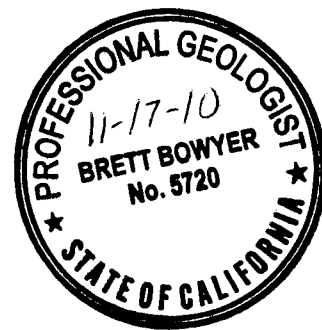
BEC and Sunkist are working closely with HMD and the RWQCB with respect to the Site demolition, data collection and evaluation, and any future remedial actions. None of the tested soil, concrete or other materials was found to contain concentrations of PCBs in excess of 50 mg/kg. As a result, we believe that Site conditions do not represent an unreasonable risk and that TSCA requirements do not apply.

CLOSING

BEC is requesting, on behalf of Sunkist, that the USEPA Region 9 review the information provided in this document, and provide us with your concurrence regarding the lack of TSCA applicability to Site conditions. If you should have any questions regarding the information provided in this document, please do not hesitate to call.

Sincerely,


Brett H. Bowyer, P.G.
Principal
Bowyer Environmental Consulting, Inc.



Figures



BEC
 16458 Bolsa Chica Street, #422
 Huntington Beach, CA 92649
 Tel. (877) 232-4620
 Fax (714) 840-4963

SITE LOCATION MAP
SUNKIST CITRUS PROCESSING PLANT
 616 East Sunkist Street, Ontario, California

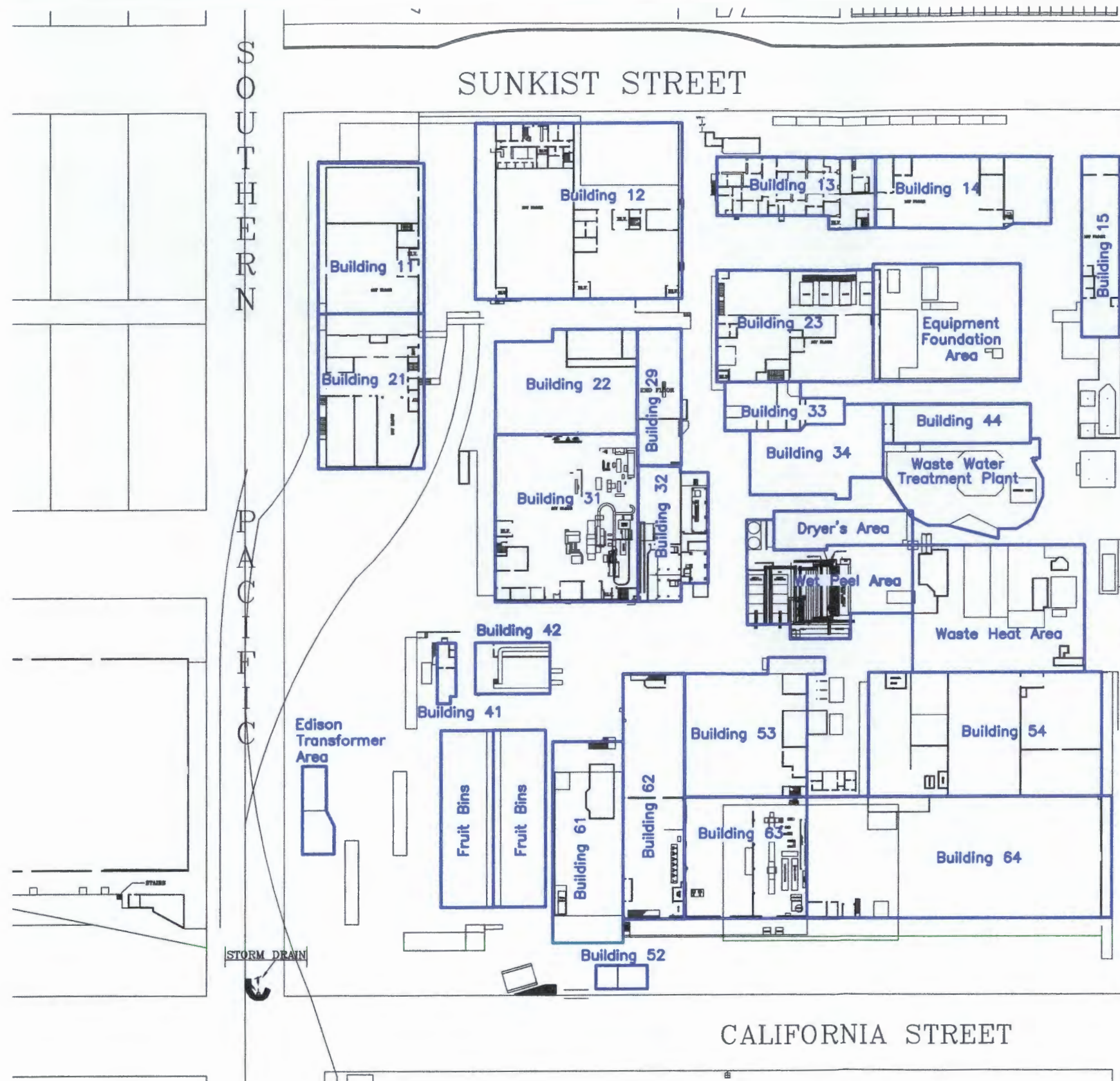
Project No.
08010001

Figure
1

08010001-05.dwg

3/2/2009 5:48PM

7/30/2009 12:21PM 08010001-14.dwg



LEGEND



Operational Area



BEC

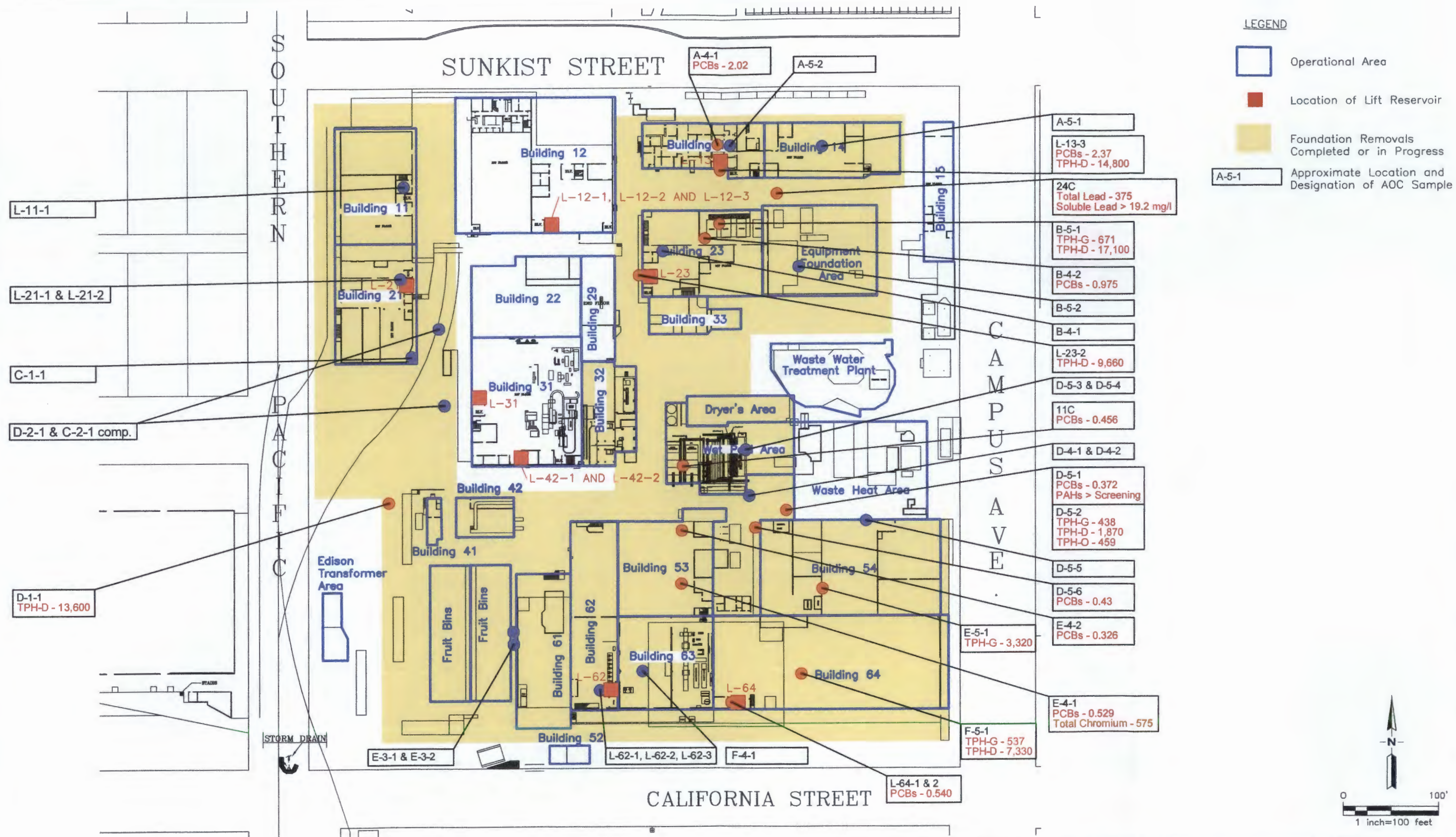
BEC
16458 Bolsa Chica Street, #422
Huntington Beach, CA 92649
Tel. (877) 232-4620
Fax (714) 840-4963

OPERATIONAL AREAS
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California


Project No.
08010001

Figure
2

11/8/2010 1:39PM 08010004-03.dwg



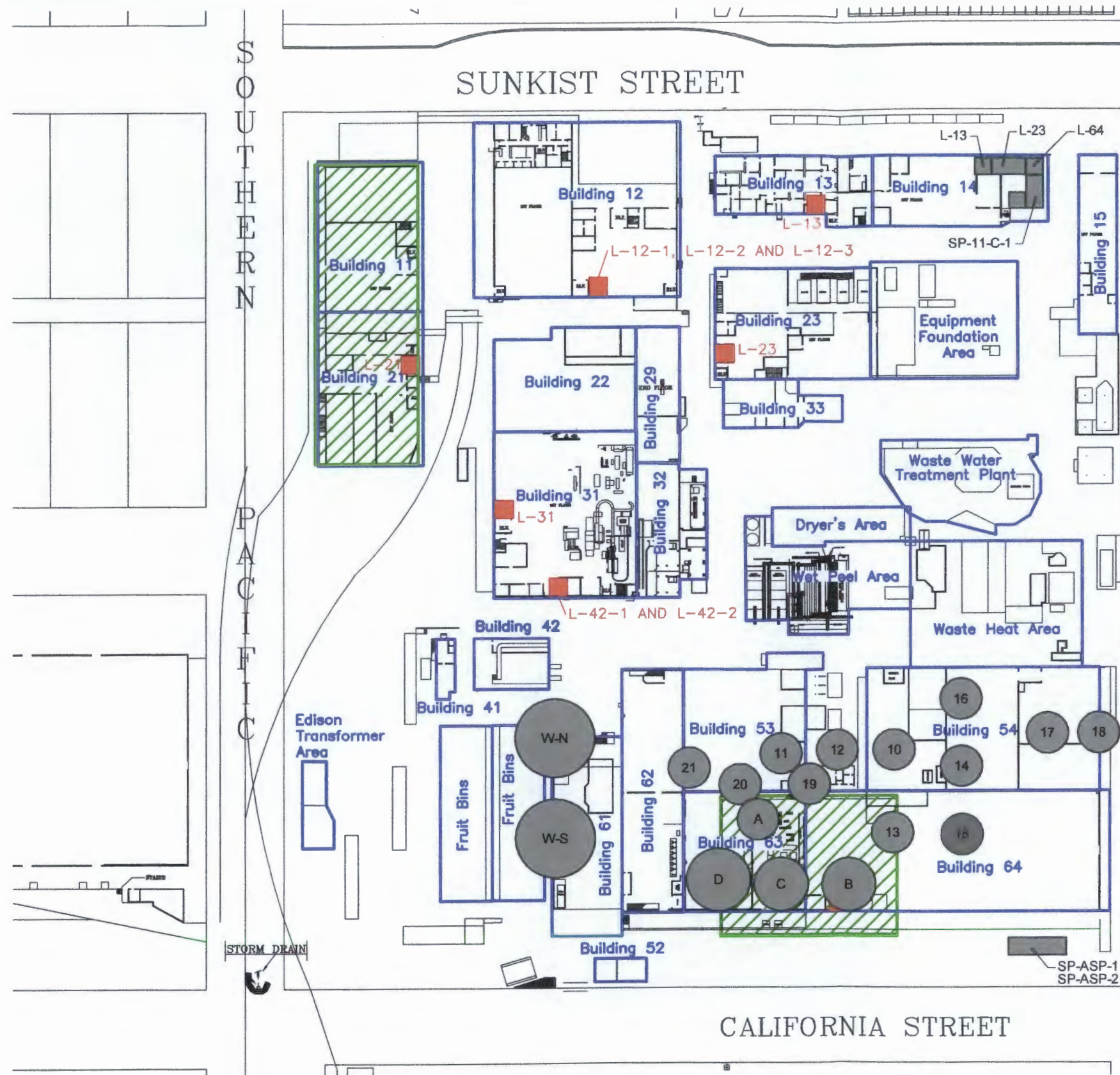
Note: Results are in milligrams per kilogram (mg/kg) unless otherwise noted.

 **BEC**
16458 Bolsa Chica Street, #422
Huntington Beach, CA 92649
Tel. (877) 232-4620
Fax (714) 840-4963

AREAS OF CONCERN AND SOIL SAMPLING RESULTS
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

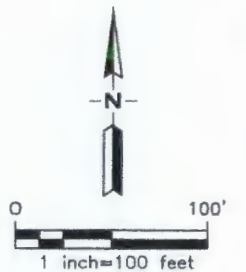
| | |
|-------------|--------|
| Project No. | Figure |
| 08010004 | 3 |

11/5/2010 10:34AM 08010004-02.dwg



LEGEND

- Operational Area
- Location of Lift Reservoir
- Approximate Location of Basement Backfilled with Crushed Concrete
- Approximate Location of Stockpile



BEC
16458 Bolsa Chica Street, #422
Huntington Beach, CA 92649
Tel. (877) 232-4620
Fax (714) 840-4963

LOCATION OF BACKFILLED BASEMENTS
AND STOCKPILES
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010004

Figure
4

70T
C
H
I
L
L
E
R

HOMOGENIZER

DEAERATOR

L-64

L64-SW4-2.5

L64-SW1-2.5

L64-SW3-2.5

L64-F1-5.0

L64-SW2-2.5

LEGEND



Operational Area

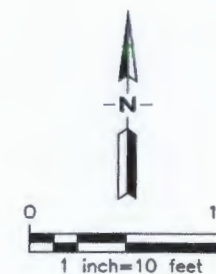
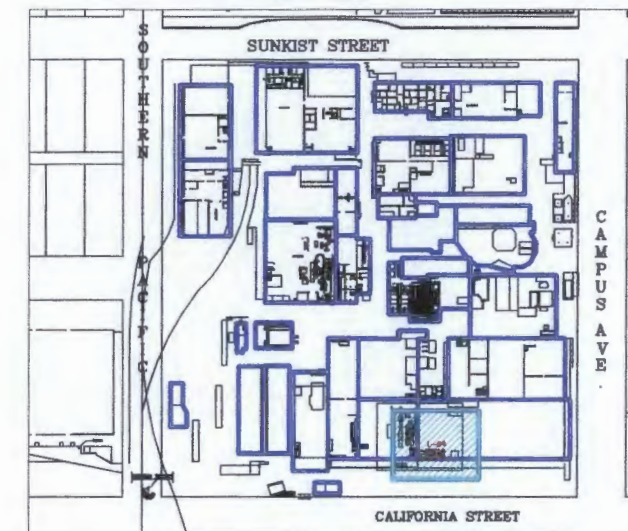


Soil Excavation Area



Soil Sampling Location

KEY MAP



11/5/2010 9:46AM 08010004-01.dwg



BEC
16458 Bolsa Chica Street, #422
Huntington Beach, CA 92649
Tel. (877) 232-4620
Fax (714) 840-4963

**SOIL SAMPLING LOCATIONS REMOVAL
ACTION AT L-64**
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010004

Figure
5

Tables

TABLE 1
Area of Concern Description
Sunkist - Former Citrus Processing Plant
Ontario, CA

| AOC and/or Lift | Sampling Date | Field Description of AOC | Dimensions (East-West, North-South in Feet) | Chemicals in Excess of Screening Criteria | Other Detected Chemicals |
|-----------------|---------------|---|--|---|--|
| A-4-1 | 7/26/2010 | Red, orange, gray and yellow soil. | 8 x 33 | Polychlorinated Biphenyls (PCBs). | Low levels of diesel-range hydrocarbons. |
| A-5-1 | 7/26/2010 | White, light-weight, soft material - Appears to be in layers. | 64 x 27 | None. Material is diatomaceous earth according to long-term former employees. | None |
| A-5-2 | 7/27/2010 | Circular brick structure (approximately 4.0 feet deep) with multiple subgrade lines. | 3 x 3 | None. | None |
| B-5-1 | 7/28/2010 | Reddish colored soil with elevated PID measurements. | 52 x 16 | Diesel-range hydrocarbons. | Low levels of gasoline-range hydrocarbons, VOCs and lead. |
| L-13-3 | 7/29/2010 | Dark stained material beneath former concrete associated with lift (L-13). | 5 x 5 | PCBs and diesel-range hydrocarbons. | Low levels of oil-range hydrocarbons. |
| B-5-2 | 8/4/2010 | Native soil appearance with elevated PID measurements. | 15 x 11 | None. | Low levels of gasoline and diesel-range hydrocarbons, and PCBS. |
| B-4-1 | 8/5/2010 | Scattered red, yellow and orange bricks. | 82 x 23 | None. | Low levels of polyaromatic hydrocarbons (PAHs). |
| B-4-2 | 8/5/2010 | Black stained material. | 13 x 15 | PCBs. | Low levels of diesel-range hydrocarbons and pesticides. |
| E-4-1 | 8/13/2010 | Yellow stained soil associated with a pipe. | 6 x 5 | PCBs and total chromium. | Low levels of pesticides, hexavalent chromium was non-detect. |
| E-4-2 | 8/16/2010 | Black stained soil with elevated PID measurements. | 7 x 6 | PCBs | Low gasoline-range hydrocarbons and pesticides. |
| L-23 | 8/19/2010 | Dark stained material beneath former concrete associated with lift (L-23). | 2 x 2 | Diesel-range hydrocarbons. | Low levels of PCBs and oil-range hydrocarbons. |
| F-5-1 | 8/19/2010 | Mixture of native soil, fill material and an unknown material. Located underneath a pipe and has elevated PID measurements. | 8 x 53 | Diesel-range hydrocarbons. | Low levels of gasoline-range hydrocarbons, oil-range hydrocarbons and PCBs.. |
| E-5-1 | 8/20/2010 | Native soil with elevated PID measurements. | 25 x 45 | Gasoline-range hydrocarbons. | Low levels of diesel-range hydrocarbons, and PCBs. |
| D-5-1 | 8/24/2010 | Native soil above a pipe associated with the waste water treatment plant. | 3 x 3 | PCBs and PAHs. | Low levels of diesel-range hydrocarbons, and pesticides. |
| D-5-2 | 8/24/2010 | Native soil under a pipe associated with the waste water treatment plant. | 3 x 3 | Diesel-range hydrocarbons. | Low levels of gasoline-range hydrocarbons, oil-range hydrocarbons and PCBs. |

TABLE 1
Area of Concern Description
Sunkist - Former Citrus Processing Plant
Ontario, CA

| AOC and/or Lift | Sampling Date | Field Description of AOC | Dimensions (East-West, North-South in Feet) | Chemicals in Excess of Screening Criteria | Other Detected Chemicals |
|-----------------|---------------|--|--|---|--|
| D-5-3 | 8/24/2010 | Native soil above a pipe associated with the waster water treatment plant. | 32 x 28 | None. | Low levels of pesticides and PCBs. |
| D-5-4 | 8/24/2010 | Black and red stained sediment under a pipe associated with the waste water treatment plant. | 32 x 28 | None. | Low levels of diesel-range hydrocarbons. |
| D-4-1 | 8/24/2010 | Native soil above a pipe associated with the waster water treatment plant. | 3 x3 | None. | Low levels of pesticides and PCBs. |
| D-4-2 | 8/24/2010 | Native soil under a pipe associated with the waste water treatment plant. | 3 x3 | None. | None. |
| F-4-1 | 8/24/2010 | Green material on sidewall of Basement 64. | 8 x 24 | None. | None. |
| D-5-5 | 8/25/2010 | Dark brown/gray stained sediment with elevated PID measurements. | 11 x 20 | None. | None. |
| D-5-6 | 8/31/2010 | Dark gray stained sediment with elevated PID measurements. | 10 x 10 | PCBs. | Low levels of gasoline and diesel-range hydrocarbons. |
| C-1-1 | 9/2/2010 | Dark gray stained sediment with elevated PID measurements. | 7 x 7 | None. | Low to moderate levels of gasoline and diesel-range hydrocarbons. |
| L-64 | 9/2/2010 | Soil beneath former concrete associated with lift (L-64). | 7 x 6 | PCB | NA. |
| L-21 | 9/8/2010 | Soil beneath former concrete associated with lift (L-21). | 20 x 15 | None. | None. |
| L-11 | 9/10/2010 | Dark stained material beneath former concrete associated with lift (L-11). | 14 x 15 | None. | Low levels of diesel-range hydrocarbons. |
| D-1-1 | 9/23/2010 | Dark gray stained sediment beneath former weigh station. | 79 x 20 | Diesel-range hydrocarbons. | Low levels of VOCs, gasoline-range hydrocarbons, and total chromium. |
| D-2 & C-2 | 9/29/2010 | Gray ballast under former tracks. | 200 x 30 | None. | Low levels of PCBs. |
| E-3 | 10/11/2010 | Soil under liquid 30 gallons released from underground line break during demolition. | 13 x 5 | None. | Low levels of PCBs. |
| L-62 | 10/26/2010 | Soil beneath former concrete associated with lift (L-62). | 7 x 6 | None. | Low levels of PCBs, and diesel-range and oil-range hydrocarbons. |

TABLE 2
Soil and Asphalt Stockpile Description/Results
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Stockpile Name | Sample Identification | Sample Date | Source | Size (CY) | Chemicals in Excess of Screening Criteria | Other Concerns |
|----------------|-----------------------|-------------|---|-----------|---|---|
| ASP-1 | SP-ASP-1 | 8/9/2010 | Asphalt from equipment foundation area. | 34 | None | PCBs, diesel and oil-range hydrocarbons, PAHs and lead. |
| ASP-2 | SP-ASP-2 | 8/9/2010 | Asphalt from equipment foundation area and building 23. | 19 | PCBs. | Diesel and oil-range hydrocarbons, PAHs and lead. |
| SP-11-C-1 | SP-11-C-1-1 | 8/18/2010 | East of 11-C in Wet Peal Area. | 43 | PCBs, total chromium and lead. | None |

TABLE 3
Volatile Organic Compounds in Soil and Stockpiled Material
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | Trichloroethene | Tetrachloroethene | n-Butylbenzene | 1,2,4- Trimethylbenzene | 1,3,5- Trimethylbenzene | tert-Butylbenzene | Naphthalene |
|--|-------------|---|-----------------|-------------------|----------------|----------------------------|----------------------------|-------------------|-------------|
| In Situ Samples from Areas of Concern | | | | | | | | | |
| A-4-1 | 7/26/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| A-5-1 | 7/26/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| A-5-2 | 7/27/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| B-5-1 | 7/28/2010 | surface | <0.005 | <0.005 | 2.04 | 4.12 | 2.15 | 7.36 | <0.005 |
| L-13-3 | 7/29/2010 | 4.75 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | 0.007 |
| B-5-2 | 8/4/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| B-4-1 | 8/5/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| B-4-2 | 8/5/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-4-1 | 8/13/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-4-2 | 8/16/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-23-2 | 8/19/2010 | 6.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| F-5-1 | 8/19/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-5-1 | 8/20/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-1 | 8/24/2010 | 1 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-2 | 8/24/2010 | 5.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-3 | 8/24/2010 | 1 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-4 | 8/24/2010 | 6 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-4-1 | 8/24/2010 | 1 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-4-2 | 8/24/2010 | 6 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| F-4-1 | 8/24/2010 | 4 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-5 | 8/25/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-5-6 | 8/31/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| C-1-1 | 9/2/2010 | 7 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | NA | NA | NA | NA | NA | NA | NA |
| L-21-1 | 9/8/2010 | 14 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-21- 2 | 9/8/2010 | 14 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-11-1&3 (comp) | 9/10/2010 | 11.5 | NA | NA | NA | NA | NA | NA | NA |
| L-11-2 | 9/10/2010 | 11.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-1-1 | 9/23/2010 | 5 | <0.005 | <0.005 | 0.086 | 0.158 | <0.005 | <0.005 | 0.393 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-3-1 | 10/11/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-3-2 | 10/11/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-62-2 | 10/26/2010 | 6.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-62-1 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA |
| L-62-3 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA |
| Stockpile Samples | | | | | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| Screening Criteria | | | | | | | | | |
| CHHSL Commercial/Industrial | | | - | - | - | - | - | - | - |
| Regional Screening Levels - Industrial | | | 14 | 2.6 | - | 260 | 10000 | - | 18 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 4
Total Petroleum Hydrocarbons in Soil and Stockpiled Material
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | | | |
|---------------------------------------|-------------|---|--|---------------------------------------|--------------------------------------|
| | | | Gasoline Range Organics ¹ | Diesel Range Organics ² | Other Range Organics ³ |
| In Situ Samples from Areas of Concern | | | | | |
| A-4-1 | 7/26/2010 | surface | <0.1 | 18.5 | <50 |
| A-5-1 | 7/26/2010 | surface | <0.1 | <10 | <50 |
| A-5-2 | 7/27/2010 | surface | <0.1 | <10 | <50 |
| B-5-1 | 7/28/2010 | surface | 671 | 17,100 | <50 |
| L-13-3 | 7/29/2010 | 4.75 | <0.1 | 14,800 | 398 |
| B-5-2 | 8/4/2010 | surface | 38.4 | 728 | <50 |
| B-4-1 | 8/5/2010 | surface | <0.1 | <10 | <50 |
| B-4-2 | 8/5/2010 | surface | <0.1 | 478 | <50 |
| E-4-1 | 8/13/2010 | surface | <0.1 | <10 | <50 |
| E-4-2 | 8/16/2010 | surface | 7.92 | <10 | <50 |
| L-23-2 | 8/19/2010 | 6.5 | <0.1 | 9,660 | 456 |
| F-5-1 | 8/19/2010 | surface | 537 | 7,330 | 574 |
| E-5-1 | 8/20/2010 | surface | 3,320 | 70.7 | <50 |
| D-5-1 | 8/24/2010 | 1 | <0.1 | 15.5 | <50 |
| D-5-2 | 8/24/2010 | 5.5 | 438 | 1,870 | 459 |
| D-5-3 | 8/24/2010 | 1 | <0.1 | <10 | <50 |
| D-5-4 | 8/24/2010 | 6 | <0.1 | 67.5 | <50 |
| D-4-1 | 8/24/2010 | 1 | <0.1 | <10 | <50 |
| D-4-2 | 8/24/2010 | 6 | <0.1 | <10 | <50 |
| F-4-1 | 8/24/2010 | 4 | <0.1 | <10 | <50 |
| D-5-5 | 8/25/2010 | surface | 3.25 | <10 | <50 |
| D-5-6 | 8/31/2010 | surface | 25 | 27.2 | <50 |
| C-1-1 | 9/2/2010 | 7 | 443 | 44.5 | <50 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | NA | NA | NA |
| L-21-1 | 9/8/2010 | 14 | <0.1 | <10 | <50 |
| L-21-2 | 9/8/2010 | 14 | <0.1 | <10 | <50 |
| L-11-1&3(comp) | 9/10/2010 | 11.5 | <0.1 | 171.0 | <50 |
| L-11-2 | 9/10/2010 | 11.5 | <0.1 | 179.0 | <50 |
| D-1-1 | 9/23/2010 | 5 | 12.4 | 13,600 | <50 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <0.1 | <10 | <50 |
| E-3-1 | 10/11/2010 | 0.5 | <0.1 | <10 | <50 |
| E-3-2 | 10/11/2010 | 0.5 | <0.1 | <10 | <50 |
| L-62-2 | 10/26/2010 | 6.5 | <0.1 | 10.9 | <50 |
| L-62-1 | 10/26/2010 | 6.5 | <0.1 | 122.0 | 118.0 |
| L-62-3 | 10/26/2010 | 6.5 | <0.1 | 825.0 | 245.0 |
| Stockpile Samples | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <0.1 | 65.9 | 357 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <0.1 | 92.1 | 401 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <0.1 | <10 | <50 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

bgs = below ground surface

NA = Not analyzed

1. Gasoline Range Organics = C4-C12 Hydrocarbons

2. Diesel Range Organics = Sum of C8-C10, C10-C18, C18-C28, and C28-C36 Hydrocarbons

3. Other Range Organics = C36-C40 Hydrocarbons

TABLE 5
Pesticides Detected in Soil and Stockpiled Material
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | 4,4'-DDD | 4,4'-DDE | 4,4'-DDT | alpha-BHC | beta-BHC | gamma-BHC (lindane) | delta-BHC | Endosulfan I | Endosulfan II | Toxaphene | alpha- Chlordane | Dieldrin | gamma- Chlordane | Endrin Ketone |
|--|-------------|--|----------|----------|----------|-----------|----------|------------------------|-----------|--------------|---------------|-----------|---------------------|----------|---------------------|------------------|
| In Situ Samples from Areas of Concern | | | | | | | | | | | | | | | | |
| A-4-1 | 7/26/2010 | surface | <0.005 | 0.00763 | 0.0175 | <0.005 | <0.005 | <0.005 | 0.0137 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| A-5-1 | 7/26/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| A-5-2 | 7/27/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| B-5-1 | 7/28/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| L-13-3 | 7/29/2010 | 4.75 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| B-5-2 | 8/4/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| B-4-1 | 8/5/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| B-4-2 | 8/5/2010 | surface | 0.0179 | 0.0849 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | 0.00972 | <0.005 | <0.005 | <0.01 |
| E-4-1 | 8/13/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | 0.0136 | <0.005 | 0.0316 | <0.01 |
| E-4-2 | 8/16/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | 0.0158 | <0.01 |
| L-23-2 | 8/19/2010 | 6.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| F-5-1 | 8/19/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| E-5-1 | 8/20/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-5-1 | 8/24/2010 | 1 | 0.0318 | 0.256 | 0.2350 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | 0.015 |
| D-5-2 | 8/24/2010 | 5.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-5-3 | 8/24/2010 | 1 | <0.005 | 0.0199 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-5-4 | 8/24/2010 | 6 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-4-1 | 8/24/2010 | 1 | <0.005 | 0.016 | 0.0123 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-4-2 | 8/24/2010 | 6 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| F-4-1 | 8/24/2010 | 4 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-5-5 | 8/25/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| D-5-6 | 8/31/2010 | surface | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| C-1-1 | 9/2/2010 | 7 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-21-1 | 9/8/2010 | 14 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-21- 2 | 9/8/2010 | 14 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-11-1&3 (comp) | 9/10/2010 | 11.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-11-2 | 9/10/2010 | 11.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-1-1 | 9/23/2010 | 5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-3-1 | 10/11/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| E-3-2 | 10/11/2010 | 0.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-62-2 | 10/26/2010 | 6.5 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-62-1 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| L-62-3 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| Stockpile Samples | | | | | | | | | | | | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.1 | <0.005 | <0.005 | <0.005 | <0.01 |
| Screening Criteria | | | | | | | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 9.00 | 6.30 | 6.30 | - | - | 2 | - | - | - | 1.8 | - | 0.13 | - | - |
| Regional Screening Levels - Industrial | | | 7.20 | 5.10 | 7.00 | 0.27 | 0.96 | 2.1 | - | 3700.00 | 3700.00 | 1.6 | - | 0.11 | - | - |

Notes:

All numbers given in mg/ kg = milligrams per kilograms.
< = Not detected at or above the listed reporting limit.
4,4-DDD = 4,4-Dichlorodiphenyldichloroethane
4,4-DDE = 4,4-Dichlorodiphenyltrichloroethane
4,4-DDT = 4,4-Dichlorodiphenyldichloroethylene
BHC = Benzene hexachloride
bgs = below ground surface
NA = Not analyzed
CHHSL = California Human Health Screening Levels
Regional Screening Levels = USEPA Screening Criteria (May 2010)
Bold = > Screening Criteria

TABLE 6
PCBs in Soil and Stockpiled Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | | | | | | | |
|--|-------------|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| | | | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 |
| In Situ Samples from Areas of Concern | | | | | | | | | |
| A-4-1 | 7/26/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.02 | <0.025 |
| A-5-1 | 7/26/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| A-5-2 | 7/27/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B-5-1 | 7/28/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-13-3 | 7/29/2010 | 4.75 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.37 | <0.025 |
| B-5-2 | 8/4/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.186 | <0.025 |
| B-4-1 | 8/5/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B-4-2 | 8/5/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.975 | <0.025 |
| E-4-1 | 8/13/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.529 | <0.025 |
| E-4-2 | 8/16/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.326 | <0.025 |
| L-23-2 | 8/19/2010 | 6.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.175 | <0.025 |
| F-5-1 | 8/19/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.075 | <0.025 |
| E-5-1 | 8/20/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.180 | <0.025 |
| D-5-1 | 8/24/2010 | 1 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.372 | <0.025 |
| D-5-2 | 8/24/2010 | 5.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.25 | <0.025 |
| D-5-3 | 8/24/2010 | 1 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0631 | <0.025 |
| D-5-4 | 8/24/2010 | 6 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-4-1 | 8/24/2010 | 1 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0435 | <0.025 |
| D-4-2 | 8/24/2010 | 6 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| F-4-1 | 8/24/2010 | 4 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-5 | 8/25/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-6 | 8/31/2010 | surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.430 | <0.025 |
| C-1-1 | 9/2/2010 | 7 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0599 | <0.025 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.540 | <0.025 |
| L-21-1 | 9/8/2010 | 14 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-21- 2 | 9/8/2010 | 14 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-11-1&3 (comp) | 9/10/2010 | 11.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-11-2 | 9/10/2010 | 11.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-1-1 | 9/23/2010 | 5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.207 | <0.025 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0615 | <0.025 |
| E-3-1 | 10/11/2010 | 0.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-3-2 | 10/11/2010 | 0.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0655 | <0.025 |
| L-62-2 | 10/26/2010 | 6.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-62-1 | 10/26/2010 | 6.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.294 | <0.025 |
| L-62-3 | 10/26/2010 | 6.5 | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0531 | <0.025 |
| Stockpile Samples | | | | | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.208 | <0.025 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.570 | <0.025 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.37 | <0.025 |
| Screening Criteria | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 |
| Regional Screening Levels - Industrial | | | 21 | 0.54 | 0.54 | 0.74 | 0.74 | 0.74 | 0.74 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 7
Metals in Soil and Stockpiled Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium (total) | Cobalt | Copper | Lead | Mercury | Molybdenum | Nickel | Selenium | Silver | Thallium | Vanadium | Zinc |
|---|-------------|--|----------|---------|--------|-----------|---------|---------------------|--------|--------|--------|---------|------------|--------|----------|--------|----------|----------|---------|
| In Situ Samples from Areas of Concern | | | | | | | | | | | | | | | | | | | |
| A-4-1 | 7/26/2010 | surface | <10 | 1.20 | 33.40 | <2.5 | <2.5 | 7.15 | 2.50 | 22.5 | 6.25 | <0.1 | <5.0 | 3.54 | <0.5 | <2.5 | <2.5 | 17.00 | 9.59 |
| A-5-1 | 7/26/2010 | surface | <10 | <0.5 | 14.1 | <2.5 | <2.5 | 2.51 | <2.5 | 9.14 | 4.8 | <0.1 | <5.0 | <2.5 | <0.5 | <2.5 | <2.5 | <0.5 | 8.80 |
| A-5-2 | 7/27/2010 | surface | <10 | 1.21 | 38.80 | <2.5 | <2.5 | 13.70 | 4.10 | 13.4 | 3.53 | <0.1 | <5.0 | 8.81 | <0.5 | <2.5 | <2.5 | 25.20 | 31.80 |
| B-5-1 | 7/28/2010 | surface | <10 | 4.39 | 67.4 | <2.5 | <2.5 | 36.8 | 8.87 | 68 | 68.4 | <0.1 | <5.0 | 18.0 | <0.5 | <2.5 | <2.5 | 34.60 | 47.70 |
| L-13-3 | 7/29/2010 | 4.75 | <10 | 4.79 | 52.60 | <2.5 | <2.5 | 33.20 | 5.58 | 11.6 | 4.23 | <0.1 | <5.0 | 7.50 | <0.5 | <2.5 | <2.5 | 35.50 | 247 |
| B-5-2 | 8/4/2010 | surface | <10 | 6.72 | 82.10 | <2.5 | <2.5 | 29.20 | 11.10 | 103 | 30.10 | <0.1 | <5.0 | 20.60 | <0.5 | <2.5 | <2.5 | 38.40 | 163 |
| B-4-1 | 8/5/2010 | surface | <10 | 5.32 | 86.9 | <2.5 | <2.5 | 21.7 | 9.05 | 31.6 | 45.3 | <0.1 | <5.0 | 9.99 | <0.5 | <2.5 | <2.5 | 41.90 | 103 |
| B-4-2 | 8/5/2010 | surface | <10 | 4.48 | 63.60 | <2.5 | <2.5 | 22.60 | 9.61 | 52.00 | 20.90 | 0.65 | <5.0 | 10.90 | <0.5 | <2.5 | <2.5 | 40.10 | 81.30 |
| E-4-1 | 8/13/2010 | surface | <10 | 6.79 | 81.70 | <2.5 | <2.5 | 575 | 5.95 | 21.70 | 7.33 | <0.1 | <5.0 | 8.11 | <0.5 | <2.5 | <2.5 | 41 | 204 |
| E-4-2 | 8/16/2010 | surface | <10 | 6.47 | 59.60 | <2.5 | <2.5 | 37.5 | 6.61 | 19.80 | 7.53 | <0.1 | <5.0 | 9.17 | <0.5 | <2.5 | <2.5 | 40.5 | 54.40 |
| L-23-2 | 8/19/2010 | 6.5 | <10 | 6.89 | 73.6 | <2.5 | <2.5 | 26.3 | 6.76 | 22.9 | 17.6 | <0.1 | <5.0 | 10.1 | <0.5 | <2.5 | <2.5 | 38.1 | 80.9 |
| F-5-1 | 8/19/2010 | surface | <10 | 5.26 | 53.2 | <2.5 | <2.5 | 15.9 | 4.41 | 11.3 | 2.9 | <0.1 | <5.0 | 6.2 | <0.5 | <2.5 | <2.5 | 27.6 | 81.9 |
| E-5-1 | 8/20/2010 | surface | <10 | 4.46 | 49.2 | <2.5 | <2.5 | 16.8 | 5.17 | 17.1 | 4.89 | <0.1 | <5.0 | 7.05 | <0.5 | <2.5 | <2.5 | 26.3 | 36.7 |
| D-5-1 | 8/24/2010 | 1 | <10 | 8.32 | 52.8 | <2.5 | <2.5 | 21.30 | 8.47 | 13.9 | 4.13 | <0.1 | <5.0 | 9.31 | <0.5 | <2.5 | <2.5 | 36.6 | 45.6 |
| D-5-2 | 8/24/2010 | 5.5 | <10 | 5.17 | 45.1 | <2.5 | <2.5 | 16.7 | 5.54 | 41.3 | 13.1 | <0.1 | <5.0 | 12.0 | <0.5 | <2.5 | <2.5 | 20.4 | 158 |
| D-5-3 | 8/24/2010 | 1 | <10 | 11.5 | 77.7 | <2.5 | <2.5 | 28.4 | 12.2 | 21.5 | 5.62 | <0.1 | <5.0 | 14.4 | <0.5 | <2.5 | <2.5 | 50.9 | 68.7 |
| D-5-4 | 8/24/2010 | 6 | <10 | 10.4 | 74.2 | <2.5 | <2.5 | 24.4 | 10.6 | 16.4 | 9.45 | <0.1 | <5.0 | 11.8 | <0.5 | <2.5 | <2.5 | 45.1 | 57.7 |
| D-4-1 | 8/24/2010 | 1 | <10 | 11.9 | 84.7 | <2.5 | <2.5 | 28.1 | 11.9 | 18.1 | 3.54 | <0.1 | <5.0 | 12.4 | <0.5 | <2.5 | <2.5 | 51 | 59.3 |
| D-4-2 | 8/24/2010 | 6 | <10 | 9.52 | 46.8 | <2.5 | <2.5 | 23.0 | 9.38 | 15.1 | 3.21 | <0.1 | <5.0 | 10.6 | <0.5 | <2.5 | <2.5 | 40.0 | 49.4 |
| F-4-1 | 8/24/2010 | 4 | <10 | 8.78 | 56.6 | <2.5 | <2.5 | 23.7 | 8.19 | 14.6 | 3.12 | <0.1 | <5.0 | 9.24 | <0.5 | <2.5 | <2.5 | 38.9 | 42.8 |
| D-5-5 | 8/25/2010 | surface | <10 | 9.45 | 66.8 | <2.5 | <2.5 | 21.8 | 10.6 | 18.8 | 3.14 | <0.1 | <5.0 | 11.4 | <0.5 | <2.5 | <2.5 | 41.1 | 60.1 |
| D-5-6 | 8/31/2010 | surface | <10 | 6.06 | 63.1 | <2.5 | <2.5 | 27.8 | 6.47 | 14.0 | 2.80 | <0.1 | <5.0 | 8.40 | <0.5 | <2.5 | <2.5 | 31.5 | 34.7 |
| C-1-1 | 9/2/2010 | 7 | <10 | 7.44 | 32.3 | <2.5 | <2.5 | 19.9 | 8.01 | 13.7 | 2.56 | <0.1 | <5.0 | 8.39 | <0.5 | <2.5 | <2.5 | 30.3 | 33.2 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-21-1 | 9/8/2010 | 14 | <10 | 6.49 | 36.5 | <2.5 | <2.5 | 33.5 | 8.20 | 12.7 | 2.54 | <0.1 | <5.0 | 8.61 | <0.5 | <2.5 | <2.5 | 40.3 | 37.1 |
| L-21- 2 | 9/8/2010 | 14 | <10 | 6.26 | 36.4 | <2.5 | <2.5 | 29.1 | 7.91 | 11.2 | 2.86 | <0.1 | <5.0 | 8.77 | <0.5 | <2.5 | <2.5 | 32.1 | 36.1 |
| L-11-1&3 (comp) | 9/10/2010 | 11.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-11-2 | 9/10/2010 | 11.5 | <10 | 5.46 | 48.7 | <2.5 | <2.5 | 31.4 | 8.8 | 13.7 | 4.40 | <0.1 | <5.0 | 9.7 | <0.5 | <2.5 | <2.5 | 33.1 | 48.0 |
| D-1-1 | 9/23/2010 | 5 | <10 | 4.25 | 69.7 | <2.5 | <2.5 | 46.5 | 14.7 | 24.1 | 25.90 | <0.1 | <5.0 | 16.9 | <0.5 | <2.5 | <2.5 | 50.1 | 110.0 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <10 | 2.54 | 50.1 | <2.5 | <2.5 | 33.3 | 5.1 | 13.8 | 7.28 | <0.1 | <5.0 | 7.67 | <0.5 | <2.5 | <2.5 | 25.8 | 42.9 |
| E-3-1 | 10/11/2010 | 0.5 | <10 | 2.91 | 54.9 | <2.5 | <2.5 | 20.7 | 4.79 | 7.52 | 4.62 | <0.1 | <5.0 | 4.52 | <0.5 | <2.5 | <2.5 | 23.7 | 21.5 |
| E-3-2 | 10/11/2010 | 0.5 | <10 | 2.85 | 47.6 | <2.5 | <2.5 | 19.6 | 4.82 | 7.85 | 3.79 | <0.1 | <5.0 | 4.92 | <0.5 | <2.5 | <2.5 | 28.8 | 27.2 |
| L-62-2 | 10/26/2010 | 6.5 | <10 | 2.19 | 23.4 | <2.5 | <2.5 | 23.1 | 4.89 | 8.36 | 2.99 | <0.1 | <5.0 | 6.32 | <0.5 | <2.5 | <2.5 | 25.2 | 21.1 |
| L-62-1 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-62-3 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Stockpile Samples | | | | | | | | | | | | | | | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <10 | 2.88 | 56.70 | <2.5 | <2.5 | 6.00 | 3.56 | 136.00 | 57.30 | <0.1 | <5.0 | 35.80 | <0.5 | <2.5 | <2.5 | 13.40 | 46.10 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <10 | 3.32 | 54.10 | <2.5 | <2.5 | 7.60 | 4.46 | 18.40 | 107.00 | <0.1 | <5.0 | 30.40 | <0.5 | <2.5 | <2.5 | 17.60 | 89.90 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <10 | 7.55 | 108 | <2.5 | <2.5 | 45.9 | 7.35 | 162 | 78.3 | <0.1 | <5.0 | 90 | <0.5 | <2.5 | <2.5 | 47.5 | 125 |
| Screening Criteria | | | | | | | | | | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 380 | 0.24 | 63,000 | 190 | 7.5 | 37* | 3,200 | 38,000 | 320 | 180 | 4,800 | 16,000 | 4,800 | 4,800 | 63 | 6,700 | 100,000 |
| Regional Screening Levels Industrial | | | 110 | 1.60 | 19,000 | 2,000 | 800 | 1,500,000** | 300 | 41,000 | 800 | 310*** | 5,100 | 20,000 | 5,100 | 5,100 | | 5,200 | 310,000 |
| Total Threshold Limit Concentration (TTLC) | | | 500 | 500 | 10,000 | 75 | 100 | 2,500 | 8,000 | 2,500 | 1,000 | 20 | 3,500 | 2,000 | 100 | 500 | 700 | 2,400 | 5,000 |
| Soluble Threshold Limit Concentration (STLC) X 10 | | | 150 | 50 | 1,000 | 7.5 | 10 | 50 | 800 | 250 | 50 | 2 | 3,500 | 200 | 10 | 50 | 70 | 240 | 250 |

Notes:

Results given in milligrams per kilogram (mg/kg), except for STLCs, which are shown in milligrams per liter (mg/l).

Background level for arsenic in the greater Los Angeles area if 11.2 mg/kg.

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

* = Assumes Chromium VI.

** = Assumes chromium III (insoluble salt).

*** = Assumes mercury, Inorganic salts.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 8
Semivolatile Organic Compounds in Soil and Stockpiled Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | Acenaphthene | Acenaphthylene | Anthracene | Benzo(a) anthracene | Benzo(a) pyrene | Benzo(b) fluoranthene | Benzo(g,h,i) perylene | Benzo(k) fluoranthene | Chrysene | Dibenzo(a,h) anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd) pyrene | Naphthalene | Phenanthrene | Pyrene |
|--|-------------|--|--------------|----------------|------------|------------------------|--------------------|--------------------------|--------------------------|--------------------------|----------|----------------------------|--------------|----------|----------------------------|-------------|--------------|--------|
| In Situ Samples from Areas of Concern | | | | | | | | | | | | | | | | | | |
| A-4-1 | 7/26/2010 | surface | <0.025 | <0.025 | 0.04 | 0.12 | 0.072 | 0.128 | <0.025 | 0.15 | 0.18 | <0.025 | 0.24 | <0.025 | <0.025 | 0.04 | 0.16 | 0.44 |
| A-5-1 | 7/26/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| A-5-2 | 7/27/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B-5-1 | 7/28/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-13-3 | 7/29/2010 | 4.75 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B-5-2 | 8/4/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| B-4-1 | 8/5/2010 | surface | <0.025 | <0.025 | <0.025 | 0.033 | <0.025 | <0.025 | <0.025 | <0.025 | 0.125 | <0.025 | 0.048 | <0.025 | <0.025 | <0.025 | 0.034 | 0.055 |
| B-4-2 | 8/5/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-4-1 | 8/13/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-4-2 | 8/16/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-23-2 | 8/19/2010 | 6.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| F-5-1 | 8/19/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-5-1 | 8/20/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-1 | 8/24/2010 | 1 | <0.025 | <0.025 | 0.31 | 2.67 | 2.65 | 4.37 | 0.51 | 1.83 | 2.44 | <0.025 | 4.18 | <0.025 | <0.025 | <0.025 | 0.83 | 5.87 |
| D-5-2 | 8/24/2010 | 5.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-3 | 8/24/2010 | 1 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-4 | 8/24/2010 | 6 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-4-1 | 8/24/2010 | 1 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-4-2 | 8/24/2010 | 6 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| F-4-1 | 8/24/2010 | 4 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-5 | 8/25/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-5-6 | 8/31/2010 | surface | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| C-1-1 | 9/2/2010 | 7 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-64-1&2 (comp) | 9/2/2010 | 17 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-21-1 | 9/8/2010 | 14 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-21- 2 | 9/8/2010 | 14 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-11-1&3 (comp) | 9/10/2010 | 11.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-11-2 | 9/10/2010 | 11.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-1-1 | 9/23.10 | 5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| D-2-1 & C-2-1 Comp | 9/29/2010 | 0.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-3-1 | 10/11/2010 | 0.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| E-3-2 | 10/11/2010 | 0.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-62-2 | 10/26/2010 | 6.5 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L-62-1 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| L-62-3 | 10/26/2010 | 6.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Stockpile Samples | | | | | | | | | | | | | | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | 0.025 | <0.025 | 0.025 | <0.025 | <0.025 | <0.025 | 0.03 | <0.025 |
| SP-ASP-2 | 8/9/2010 | Asphalt | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | 0.031 | <0.025 | 0.026 | <0.025 | <0.025 | <0.025 | 0.07 | <0.025 |
| SP-11-C-1-1 | 8/18/2010 | Soil | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| Screening Criteria | | | | | | | | | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | - | - | - | - | 0.13 | - | - | - | - | - | - | - | - | - | - | - |
| Regional Screening Levels - Industrial | | | 33000 | - | 170,000 | 2.1 | 0.21 | 2.1 | - | 21 | 210 | 0.21 | 22,000 | 22,000 | 2.1 | 18 | - | 17,000 |

Notes:
Results given in milligrams per kilogram (mg/kg).
< = Not detected at or above the listed reporting limit.
Bold = Values > Screening Criteria.
bgs = below ground surface
NA = Not analyzed
CHHSL = California Human Health Screening Levels
Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 9

***Soluble Lead and Hexavalent Chromium in Soil and Stockpiled Materials
Sunkist - Former Citrus Processing Plant
Ontario, CA***

| Sample Identification | Sample Date | Sample Depth (feet bgs) | WET Lead (mg/L) | TCLP (mg/L) | Hexavalent Chromium (mg/kg) |
|--|-------------|-------------------------|-----------------|-------------|-----------------------------|
| In Situ Samples from Areas of Concern | | | | | |
| B-5-1 | 7/28/2010 | surface | 0.95 | NA | NA |
| E-4-1 | 8/13/2010 | surface | NA | NA | <0.1 |
| Stockpile Samples | | | | | |
| SP-ASP-1 | 8/9/2010 | Asphalt | 0.52 | NA | NA |
| SP-ASP-2 | 8/9/2010 | Asphalt | 1.26 | NA | NA |
| SP-11-C1-1 | 8/18/2010 | Soil | 3.86 | NA | <0.1 |
| Waste/Screening Criteria | | | | | |
| Ten Times the STLC | | | 5 | - | - |
| RCRA Level | | | - | 5 | - |
| CHHSL Commercial/Industrial | | | NA | NA | 37 |

Notes:

mg/L = milligrams per liter.

mg/kg = milligrams per kilogram.

< = Not detected at or above the listed reporting limit.

STLC = Soluble threshold limit Concentration (California hazardous waste screening criteria).

RCRA - Resource, Conservation and Recovery Act (Federal hazardous waste criteria).

Bold = Values > Screening Criteria.

NA = Not analyzed

Bold = > Screening Criteria

TABLE 10
PCBs in Soil at Removal Area L-64
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 |
|--|-------------|-------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| In Situ Samples from Areas of Concern | | | | | | | | | |
| L64-F1-5.0 | 9/20/2010 | | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0515 | <0.025 |
| L64-SW1-2.5 | 9/20/2010 | | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L64-SW2-2.5 | 9/20/2010 | | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L64-SW3-2.5 | 9/20/2010 | | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| L64-SW4-2.5 | 9/20/2010 | | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| Screening Criteria | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 |
| Regional Screening Levels - Industrial | | | 21 | 0.54 | 0.54 | 0.74 | 0.74 | 0.74 | 0.74 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 11
PCBs in Stockpiled Concrete and Crushed Concrete
Sunkist - Former Citrus Processing Plant
Ontario, CA

Preliminary

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Placement |
|--|-------------|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------------|
| | | | | | | | | | | |
| Stockpile Concrete | | | | | | | | | | |
| SPC-A-1 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.866 | <0.025 | NA |
| SPC-A-2 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.068 | <0.025 | NA |
| SPC-A-3 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-A-4 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-A-5 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.03 | <0.025 | NA |
| SPC-A-6 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0406 | <0.025 | NA |
| SPC-A-7 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.155 | <0.025 | NA |
| SPC-A-8 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.11 | <0.025 | NA |
| SPC-A-9 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.0888 | <0.025 | NA |
| SPC-A-10 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-A-11 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.291 | <0.025 | NA |
| SPC-B-1 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.193 | <0.025 | NA |
| SPC-B-2 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-B-3 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-B-4 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.571 | <0.025 | NA |
| SPC-B-5 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-B-6 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.146 | <0.025 | NA |
| SPC-C-1 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.063 | <0.025 | NA |
| SPC-C-2 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-C-3 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-C-4 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-C-5 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | NA |
| SPC-C-6 | 9/3/2010 | Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.21 | <0.025 | NA |
| | | | | | | | | | | |
| Stockpile Crushed Concrete | | | | | | | | | | |
| SPC-CC-1 | 9/3/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.122 | <0.025 | Basement 64 |
| SPC-CC-2 | 9/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.59 | <0.025 | Basement 64 |
| SPC-CC-3 | 9/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.822 | <0.025 | Basement 64 |
| SPC-CC-4 | 9/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.01 | <0.025 | Basement 64 |
| SPC-CC-5 | 9/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.42 | <0.025 | Basement 64 |
| SPC-CC-6 | 9/9/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.68 | <0.025 | Basement 64 |
| SPC-CC-7 | 9/9/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.879 | <0.025 | Basement 64 |
| SPC-CC-8 | 9/10/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.04 | <0.025 | Basement 64 |
| SPC-CC-9 | 9/10/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.175 | <0.025 | Basement 64 |
| SPC-CC-10 | 9/22/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | Basement 64 |
| SPC-CC-11 | 9/23/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 3.020 | <0.025 | Basement 64 |
| SPC-CC-12 | 9/24/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.250 | <0.025 | Basement 64 |
| SPC-CC-13 | 9/25/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.000 | <0.025 | Basement 11 |
| SPC-CC-14 | 9/27/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.330 | <0.025 | Basement 11 |
| SPC-CC-15 | 9/28/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 5.410 | <0.025 | Basement 11 and 21 |
| SPC-CC-16 | 9/28/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 27.200 | <0.025 | Basement 21 |
| SPC-CC-17 | 9/29/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 4.540 | <0.025 | Basement 21 |
| SPC-CC-18 | 9/30/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 4.790 | <0.025 | Basement 64 |
| SPC-CC-19 | 9/30/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.960 | <0.025 | Basement 21 |
| SPC-CC-20 | 10/1/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.992 | <0.025 | Basement 11 |
| SPC-CC-21 | 10/1/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 3.670 | <0.025 | Basement 11 |
| SPC-CC-22 | 10/2/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 4.030 | <0.025 | Basement 21 |
| SPC-CC-23 | 10/2/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.510 | <0.025 | Basement 11 |
| SPC-CC-24 | 10/4/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.341 | <0.025 | Basement 21 |
| SPC-CC-25 | 10/5/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.260 | <0.025 | Basement 21 |
| SPC-CC-26 | 10/5/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.870 | <0.025 | Basement 21 |
| SPC-CC-27 | 10/6/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.389 | <0.025 | Western - North |
| SPC-CC-28 | 10/6/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.279 | <0.025 | Western - South |
| SPC-CC-29 | 10/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 16.10 | <0.025 | Western - North |
| SPC-CC-30 | 10/8/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.321 | <0.025 | Western - South |
| SPC-CC-31 | 10/9/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 8.050 | <0.025 | Eastern D |
| SPC-CC-32 | 10/11/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 5.990 | <0.025 | Eastern D |
| SPC-CC-33 | 10/12/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.980 | <0.025 | Eastern B |
| SPC-CC-34 | 10/12/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.738 | <0.025 | Eastern A |
| SPC-CC-35 | 10/12/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.890 | <0.025 | Eastern B |
| SPC-CC-36 | 10/13/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 1.560 | <0.025 | Eastern B |
| SPC-CC-37 | 10/13/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 2.980 | <0.025 | Eastern C |
| SPC-CC-38 | 10/14/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 3.200 | <0.025 | Eastern C |
| SPC-CC-39 | 10/15/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 9.280 | <0.025 | Eastern D |
| SPC-CC-40 | 10/19/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 14.000 | <0.025 | Eastern Pile 10 |
| SPC-CC-41 | 10/19/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.258 | <0.025 | Eastern Pile 11 |
| SPC-CC-42 | 10/19/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.447 | <0.025 | Eastern Pile 12 |
| SPC-CC-43 | 10/22/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 5.330 | <0.025 | Eastern Pile 13 |
| SPC-CC-44 | 10/25/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 3.550 | <0.025 | Eastern Pile 14 |
| SPC-CC-45 | 10/25/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 5.330 | <0.025 | Eastern Pile 15 |
| SPC-CC-46 | 10/26/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 6.460 | <0.025 | Eastern Pile 16 |
| SPC-CC-47 | 10/27/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 8.590 | <0.025 | Eastern Pile 17 |
| SPC-CC-48 | 10/28/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 5.030 | <0.025 | Eastern Pile 18 |
| SPC-CC-49 | 10/29/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.332 | <0.025 | Eastern Pile 19 |
| SPC-CC-50 | 10/30/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.444 | <0.025 | Eastern Pile 20 |
| SPC-CC-51 | 11/2/2010 | Crushed Concrete | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.274 | <0.025 | Eastern Pile 21 |
| | | | | | | | | | | |
| Screening Criteria | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | |
| Regional Screening Levels - Industrial | | | 21 | 0.54 | 0.54 | 0.74 | 0.74 | 0.74 | 0.74 | |

Notes:
Results given in milligrams per kilogram (mg/kg).
< = Not detected at or above the listed reporting limit.
Bold = Values > Screening Criteria.
bgs = below ground surface
NA = Not analyzed
CHHSL = California Human Health Screening Levels
Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 12

**Total Petroleum Hydrocarbons in Stockpiled Concrete and Crushed Concrete
Sunkist - Former Citrus Processing Plant
Ontario, CA**

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | | | |
|----------------------------|-------------|--|--------------------------------------|------------------------------------|-----------------------------------|
| | | | Gasoline Range Organics ¹ | Diesel Range Organics ² | Other Range Organics ³ |
| | | | | | |
| Stockpile Concrete | | | | | |
| SPC-A-1 | 9/3/2010 | Concrete | <0.1 | 14.8 | <50 |
| SPC-A-2 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-3 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-4 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-5 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-6 | 9/3/2010 | Concrete | <0.1 | 13.9 | <50 |
| SPC-A-7 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-8 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-9 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-10 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-A-11 | 9/3/2010 | Concrete | <0.1 | 10.4 | <50 |
| SPC-B-1 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-B-2 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-B-3 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-B-4 | 9/3/2010 | Concrete | <0.1 | 16.3 | <50 |
| SPC-B-5 | 9/3/2010 | Concrete | <0.1 | 13.4 | <50 |
| SPC-B-6 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-C-1 | 9/3/2010 | Concrete | <0.1 | 18.6 | <50 |
| SPC-C-2 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-C-3 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-C-4 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-C-5 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| SPC-C-6 | 9/3/2010 | Concrete | <0.1 | <10 | <50 |
| | | | | | |
| Stockpile Crushed Concrete | | | | | |
| SPC-CC-1 | 9/3/2010 | Crushed Concrete | <0.1 | 14.4 | <50 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

bgs = below ground surface

NA = Not analyzed

1. Gasoline Range Organics = C4-C12 Hydrocarbons

2. Diesel Range Organics = Sum of C8-C10, C10-C18, C18-C28, and C28-C36 Hydrocarbons

3. Other Range Organics = C36-C40 Hydrocarbons

TABLE 13
Metals in Stockpiled Concrete and Crushed Concrete
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | | | | | | | | | | | | | | | | | |
|---|-------------|--|----------|---------|--------|-----------|---------|------------------|--------|--------|-------|---------|------------|--------|----------|--------|----------|----------|---------|
| | | | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium (total) | Cobalt | Copper | Lead | Mercury | Molybdenum | Nickel | Selenium | Silver | Thallium | Vanadium | Zinc |
| Stockpile Concrete | | | | | | | | | | | | | | | | | | | |
| SPC-A-1 | 9/9/2010 | Concrete | <10 | 7.20 | 74.20 | <2.5 | <2.5 | 19.10 | 3.90 | 11.90 | 9.51 | <0.1 | <0.5 | 4.36 | <0.5 | <2.5 | <2.5 | 26.30 | 55.40 |
| SPC-A-2 | 9/9/2010 | Concrete | <10 | 8.23 | 67.40 | <2.5 | <2.5 | 20.60 | 6.39 | 17.20 | 4.26 | <0.1 | <0.5 | 10.50 | <0.5 | <2.5 | <2.5 | 33.50 | 38.00 |
| SPC-B-1 | 9/9/2010 | Concrete | <10 | 3.56 | 45.70 | <2.5 | <2.5 | 6.48 | 2.33 | 5.62 | 2.72 | <0.1 | <0.5 | 2.99 | <0.5 | <2.5 | <2.5 | 13.20 | 13.00 |
| SPC-C-1 | 9/9/2010 | Concrete | <10 | 7.64 | 92.50 | <2.5 | <2.5 | 18.10 | 5.36 | 14.60 | 4.99 | <0.1 | <0.5 | 10.80 | <0.5 | <2.5 | <2.5 | 33.80 | 25.60 |
| Stockpile Crushed Concrete | | | | | | | | | | | | | | | | | | | |
| SPC-CC-1 | 9/9/2010 | Crushed Concrete | <10 | 6.49 | 56.50 | <2.5 | <2.5 | 14.90 | 5.40 | 13.10 | 6.25 | <0.1 | <0.5 | 5.66 | <0.5 | <2.5 | <2.5 | 25.30 | 30.50 |
| Screening Criteria | | | | | | | | | | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 380 | 0.24 | 63,000 | 190 | 7.5 | 37* | 3,200 | 38,000 | 320 | 180 | 4,800 | 16,000 | 4,800 | 4,800 | 63 | 6,700 | 100,000 |
| Regional Screening Levels - Industrial | | | 410 | 1.60 | 19,000 | 2,000 | 800 | 1,500,000** | 300 | 41,000 | 800 | 310*** | 5,100 | 20,000 | 5,100 | 5,100 | - | 5,200 | 310,000 |
| Total Threshold Limit Concentration (TTLC) | | | 500 | 500 | 10,000 | 75 | 100 | 2,500 | 8,000 | 2,500 | 1,000 | 20 | 3,500 | 2,000 | 100 | 500 | 700 | 2,400 | 5,000 |
| Soluble Threshold Limit Concentration (STLC) X 10 | | | 150 | 50 | 1,000 | 7.5 | 10 | 50 | 800 | 250 | 50 | 2 | 3,500 | 200 | 10 | 50 | 70 | 240 | 250 |

Notes:

Results given in milligrams per kilogram (mg/kg), except for STLCs, which are shown in milligrams per liter (mg/l).

Background level for arsenic in the greater Los Angeles area is 11.2 mg/kg.

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

* = Assumes Chromium VI.

** = Assumes chromium III (insoluble salt).

*** = Assumes mercury, Inorganic salts.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 14
Semivolatile Organic Compounds in Stockpiled Concrete and Crushed Concrete
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identification | Sample Date | Sample Depth (feet bgs) or Stockpile Description | Acenaphthene | Acenaphthylene | Anthracene | Benzo(a) anthracene | Benzo(a) pyrene | Benzo(b) fluoranthene | Benzo(g,h,i) perylene | Benzo(k) fluoranthene | Chrysene | Dibenzo(a,h) anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd) pyrene | Naphthalene | Phenanthrene | Pyrene |
|--|-------------|--|--------------|----------------|------------|---------------------|-----------------|-----------------------|-----------------------|-----------------------|----------|-------------------------|--------------|----------|-------------------------|-------------|--------------|--------|
| Stockpile Concrete | | | | | | | | | | | | | | | | | | |
| SPC-A-1 | 9/9/2010 | Concrete | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | 0.025 | <0.025 | 0.025 | <0.025 | <0.025 | <0.025 | 0.03 | <0.025 |
| SPC-A-2 | 9/9/2010 | Concrete | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | 0.031 | <0.025 | 0.026 | <0.025 | <0.025 | <0.025 | 0.07 | <0.025 |
| SPC-B-1 | 9/9/2010 | Concrete | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| SPC-C-1 | 9/9/2010 | Concrete | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| Stockpile Crushed Concrete | | | | | | | | | | | | | | | | | | |
| SPC-CC-1 | 9/9/2010 | Crushed Concrete | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| Screening Criteria | | | | | | | | | | | | | | | | | | |
| CHHSL Commercial/Industrial | | | - | - | - | - | 0.13 | - | - | - | - | - | - | - | - | - | - | - |
| Regional Screening Levels - Industrial | | | 33000 | - | 170,000 | 2.1 | 0.21 | 2.1 | - | 21 | 210 | 0.21 | 22,000 | 22,000 | 2.1 | 18 | - | 17,000 |

Notes:

Results given in milligrams per kilogram (mg/kg).

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

bgs = below ground surface

NA = Not analyzed

CHHSL = California Human Health Screening Levels

Regional Screening Levels = USEPA Screening Criteria (May 2010)

TABLE 15
PCBs in Pre-Excavated Asphalt
Sunkist - Former Citrus Processing Plant
Ontario, CA

| Sample Identificati on | Sample Date | Sample Depth (feet bgs) | | | | | | | |
|--|----------------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | | | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 |
| SP-ASP-3 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.061 | <0.025 |
| SP-ASP-4 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.094 | <0.025 |
| SP-ASP-5 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.108 | <0.025 |
| SP-ASP-6 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.174 | <0.025 |
| SP-ASP-7 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.852 | <0.025 |
| SP-ASP-8 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.112 | <0.025 |
| SP-ASP-9 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| SP-ASP-10 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.132 | <0.025 |
| SP-ASP-11 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | <0.025 | <0.025 |
| SP-ASP-12 | 10/5/2010 | Surface | <0.025 | <0.050 | <0.025 | <0.025 | <0.025 | 0.17 | <0.025 |
| Screening Criteria | | | | | | | | | |
| CHHSL Commercial/Industrial | | | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 |
| Regional Screening Levels - Industrial | | | 21 | 0.54 | 0.54 | 0.74 | 0.74 | 0.74 | 0.74 |

Notes:

- Results given in milligrams per kilogram (mg/kg).
- < = Not detected at or above the listed reporting limit.
- Bold** = Values > Screening Criteria.
- bgs = below ground surface
- NA = Not analyzed
- CHHSL = California Human Health Screening Levels
- Regional Screening Levels = USEPA Screening Criteria (May 2010)

Attachment

*Removal Action L-64
Agency Correspondence*

From: [Crutsinger, Jackson](#)
To: [Brett Bowyer](#)
Subject: RE: Sunkist Ontario - Site Visit Summary - L-64 Removal Action
Date: Monday, October 04, 2010 8:21:34 AM

Thanks Brett for writing up a summary of our field inspection. I concur with your account, and confirm a verbal approval to backfill the excavation.

Jackson Crutsinger, R.E.H.S., R.H.S.P.
Hazardous Materials Specialist III
Fire Department/HAZMAT
(909) 386-8439
jcrutsinger@sbcfire.org

From: Brett Bowyer [mailto:brettbowyer@bowyerenvironmental.com]
Sent: Thursday, September 30, 2010 11:10 AM
To: Crutsinger, Jackson
Subject: Sunkist Ontario - Site Visit Summary - L-64 Removal Action

Hello Jackson,

As we discussed, I am sending you this email to summarize the Site visit that you performed on September 29, 2010. During the Site visit you observed the excavation area associated with the removal action that took place at the former lift floor structure in the Basement that formerly underlay Building 64. As per the information sent to you on September 28, 2010, the excavation took place on September 20, 2010. It was performed as a result of slightly elevated PCB concentrations that were observed in soil that underlay the concrete floor of the former lift floor structure. The excavation extended to a depth of approximately 5.0 feet beneath the former floor of the lift structure, and extended over an area of approximately 14 (east to west) by 10 (north to south) feet. As shown on the tables submitted on September 28, 2010, none of the five confirmation soil samples contained significant concentrations of PCBs.

You also observed the soil stockpile that was generated during the L-64 removal action. This stockpile will be disposed of offsite.

Based on the results provided and the site visit, you verbally approved the backfilling of the former L-64 removal action area as additional work in this area is not warranted.

We appreciate your continued responsiveness with respect to this project. If you have any questions regarding this Site Visit Summary, please feel free to call.

Thanks.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900

Huntington Beach, CA 92647

Office: (877) BEC-INC-0

(877) 232-4620

Cell: (714) 878-7191

FAX (714) 840-4963

brettbowyer@bowyerenvironmental.com

www.bowyerenvironmental.com

This message contains information that may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete this message completely from your computer system. Thank you.